

1 ROBBINS GELLER RUDMAN & DOWD LLP  
DANIEL S. DROSMAN (200643)  
2 TOR GRONBORG (179109)  
ELLEN GUSIKOFF STEWART (144892)  
3 LUCAS F. OLTS (234843)  
J. MARCO JANOSKI GRAY (306547)  
4 CHRISTOPHER R. KINNON (316850)  
HEATHER G. GEIGER (322937)  
5 655 West Broadway, Suite 1900  
San Diego, CA 92101-8498  
6 Telephone: 619/231-1058  
619/231-7423 (fax)

7  
MOTLEY RICE LLC  
8 GREGG S. LEVIN (admitted *pro hac vice*)  
LANCE V. OLIVER (admitted *pro hac vice*)  
9 MEGHAN S.B. OLIVER (admitted *pro hac vice*)  
MAX N. GRUETZMACHER (admitted *pro hac vice*)  
10 CHRISTOPHER F. MORIARTY (admitted *pro hac vice*)  
MEREDITH B. WEATHERBY (admitted *pro hac vice*)  
11 28 Bridgeside Blvd.  
Mt. Pleasant, SC 29464  
12 Telephone: 843/216-9000  
843/216-9450 (fax)

13 *Co-Class Counsel for the Class*

14  
15 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
16 **OAKLAND DIVISION**

17 In re TWITTER INC. SECURITIES  
LITIGATION

) Case No. 4:16-cv-05314-JST (SK)

) CLASS ACTION

)  
) **DECLARATION OF LESLEY E.**  
) **WEAVER IN SUPPORT OF CLASS**  
) **COUNSEL'S MOTION FOR**  
) **ATTORNEYS' FEES AND LITIGATION**  
) **EXPENSES ON BEHALF OF**  
) **BLEICHMAR FONTI & AULD LLP**

20 This Document Relates To:

21 ALL ACTIONS.

)  
) JUDGE: Hon. Jon S. Tigar  
) DATE: November 17, 2022  
) TIME: 2:00 p.m. (Via Videoconference)

1 I, Lesley E. Weaver, declare and state as follows:

2 1. I am an attorney licensed in the State of California and admitted to the United States  
3 District Court for the Northern District of California. I am the Partner-in-Charge of the Oakland,  
4 California office of Bleichmar Fonti & Auld LLP (“BFA”) and the head of its Consumer and  
5 Antitrust Practice Group. I submit this declaration in support of Class Counsel’s application for an  
6 award of attorneys’ fees in connection with services rendered in the above-captioned class action  
7 (the “Action”), as well as for reimbursement of expenses incurred by my firm in connection with  
8 this Action on behalf of the Class. I have personal knowledge of the matters stated herein and, if  
9 called upon, I could and would competently testify thereto.

10 **I. INTRODUCTION**

11 2. My firm served as counsel for Lead Plaintiff KBC Asset Management NV (“KBC”)  
12 from case inception through September 20, 2021, and as Court-appointed Liaison Counsel from  
13 December 22, 2016 through September 20, 2021. In this capacity, my firm was involved in the  
14 following tasks with Class Counsel, among others: assisting with litigation strategy of overall case;  
15 investigating the factual and legal claims asserted; preparing and participating in oral argument  
16 before the Court regarding KBC’s motion for appointment as lead plaintiff; researching, drafting,  
17 and filing the Consolidated Amended Complaint; researching, drafting, and filing the Oppositions  
18 to Defendants’ Motion to Dismiss and Request for Judicial Notice; assisting Class Counsel with  
19 preparing, and responding to, discovery requests; briefing discovery; reviewing and analyzing  
20 thousands of pages of documents produced throughout the litigation; assisting Class Counsel with  
21 preparing for the depositions of defendants; drafting, revising, and filing the Motion for Class  
22 Certification; and preparing for trial.

23 3. The information in this declaration and its exhibits regarding the time spent on the  
24 Action by the partners, attorneys, and other professional support staff of my firm is based on  
25 contemporaneous, daily time records regularly prepared and maintained by my firm.

26 4. The information in this declaration and its exhibits regarding expenses is based on  
27 the books and records of my firm. These books and records are prepared from expense vouchers,  
28 check records, and other source materials, and represent an accurate recordation of the expenses

1 incurred.

2       5.       The time and expense records have been reviewed in connection with the  
3 preparation of this declaration to confirm the accuracy of the time entries and expenses as well as  
4 the necessity for, and fair and reasonableness of, the time and expenses committed to the Action.  
5 In preparing the lodestar tabulations, my firm exercised considerable billing judgment, which  
6 resulted in reductions to both time entries and expenses. In addition, my firm excluded from the  
7 lodestar altogether time related to the preparation of this declaration, as well as all time billed by  
8 any timekeeper who spent fewer than 10 hours working on the Action.

9       6.       I believe that the time and work reflected in my firm's lodestar tabulations, as  
10 shown in Exhibits 1, 4, 5, and 6, is reasonable in amount and was necessary for the effective and  
11 efficient prosecution and resolution of the Action. In addition, the expenses are the type typically  
12 and necessarily incurred, directly related to the Action, and normally charged to fee-paying clients.

13       7.       As set forth in Exhibit 1 and the other exhibits to this declaration, the hourly rates  
14 for the attorneys and professional support staff at my firm range from \$350 to \$1,050 and are the  
15 usual and customary rates set by my firm for each individual. Different timekeepers within the  
16 same employment category (e.g., partner, associate, etc.) may have different hourly rates  
17 depending on their respective years of experience, years at the firm, years in their current position,  
18 relevant experience, relevant expertise, and/or rates of similarly situated individuals at my firm or  
19 at peer firms. For individuals who are no longer employed by my firm, the "current rate" used for  
20 the lodestar calculations is based upon the rate for that person in his or her final year of employment  
21 with my firm. These hourly rates are the same as, or comparable to, the rates set by peer firms for  
22 attorneys of similar skill and experience, including rates that have been approved by courts in this  
23 District, in other contingent-fee securities-class-action litigation or shareholder litigation.

24 **II. HOURS AND LODESTAR INFORMATION**

25       8.       Attached as Exhibit 1 is a summary lodestar chart which lists (1) the name of each  
26 timekeeper at my firm who devoted more than 10 hours to working on the Action; (2) their title or  
27 position (e.g., partner, special counsel, associate, paralegal); (3) the total number of hours they  
28 worked on the Action from its inception through September 20, 2021; (4) their current hourly

1 billing rate; (5) their lodestar (at both current and historic rates); and (6) a brief summary of the  
 2 primary work they performed in connection with the Action.

3 9. The total number of hours expended on the Action by my firm from case inception  
 4 through September 20, 2021, is 2,491.75 hours. The total lodestar for my firm is \$1,384,765.00  
 5 based on current rates and based on \$1,260,103.75 historic rates.

6 10. Attached as Exhibit 2 are summary descriptions describing the principal tasks in  
 7 which each attorney and support staff at my firm were involved in the Action.

8 11. Attached as Exhibit 3 are brief biographical summaries for each timekeeper listed  
 9 in Exhibit 1, including information about their qualifications, education, and relevant experience.

10 12. Attached as Exhibit 4 is an Excel spreadsheet which lists (1) the name and position  
 11 of each timekeeper; (2) the hours incurred by that timekeeper in each month during the course of  
 12 the litigation in each of the 11 task categories; (3) the hourly rate charged for each timekeeper  
 13 during that month; (4) their lodestar at the historic rate; (5) the current rate for each timekeeper (or  
 14 most recent rate for former employees); and (6) their lodestar at the current rate. Exhibit 4 (the  
 15 “Lodestar Chart by Timekeeper and Month”) reflects the hours expended from inception through  
 16 September 20, 2021.

17 13. Attached as Exhibit 5 is an Excel spreadsheet summarizing certain information  
 18 contained in Exhibit 4. Specifically, Exhibit 5 (the “Summary of Categories by Month”) reflects  
 19 the total hours spent by all of my firm’s timekeepers in each of the 11 task categories during each  
 20 month, and also shows the total lodestar for all timekeepers for each month at both their historic  
 21 and current rates (or most recent rate for former employees).

22 14. Attached as Exhibit 6 is an Excel spreadsheet summarizing certain information  
 23 contained in Exhibit 4. Specifically, Exhibit 6 (the “Summary of Categories by Timekeeper”) reflects the hours spent during the Action by each timekeeper in each of the 11 task categories,  
 24 and also shows each timekeeper’s individual hours and lodestar at both their historic and current  
 25 rates (or most recent rate for former employees).  
 26

### 27 **III. EXPENSE INFORMATION**

28 15. My firm also respectfully requests an award of \$7,286.62 for unreimbursed



1 litigation expenses and charges incurred in connection with the prosecution of the Action from its  
2 inception through September 20, 2021. These expenses were reasonably necessary in the  
3 prosecution of the Action, and my firm incurred these expenses with full knowledge of the risk  
4 that it might not recover any of them if the litigation was not successful.

5 16. Attached as Exhibit 7 is a chart summarizing my firm's expenses and charges by  
6 category, incurred through September 20, 2021. Attached as Exhibit 8 is a detailed listing of these  
7 individual expenses and charges, organized by category. These expenses have been reviewed for  
8 reasonableness and accuracy.

9 17. Consistent with this Court's order in *Rodman v. Safeway Inc.*, Case No. 3:11-cv-  
10 03003-JST (N.D. Cal. Mar. 21, 2018), we have attached true and correct copies of invoices and  
11 receipts for: (a) all transportation, meals, and accommodations expenses; and (b) all other expenses  
12 that exceed \$500.00.

13 18. **Transportation, Meals, and Accommodations Expenses:** In connection with the  
14 prosecution of the Action, my firm incurred a total of \$4,044.27 on limited out-of-town  
15 transportation, including airfare, meals, and accommodations while traveling. Attached as Exhibit  
16 9 are true and correct copies of all invoices or receipts relating to transportation, meals, and  
17 accommodations, in chronological order and organized by month. In addition, all transportation  
18 and meal expenses submitted for reimbursement were limited by internal travel and meal  
19 restrictions, specifically: (i) airfare is capped at coach rates; (ii) meals while traveling are capped  
20 at \$25 per person for breakfast, \$30 per person for lunch, and \$55 per person for dinner; and (iii)  
21 hotel charges are capped at \$400 per night for large cities and \$300 per night for small cities.

22 19. **Other Expenses:** Certain other expenses are the type typically and necessarily  
23 incurred in complex securities litigation. Invoices or receipts for these certain other expenses are  
24 available upon request. The following is information regarding these certain other expenses:

25 a. Court Reporter Costs and Service & Filing Fees: \$1,316.45. These expenses  
26 were paid to obtain hearing transcripts, to call into a hearing, and to serve  
27 process.

28 b. Postage & Express Mail: \$157.93. These expenses were paid to FedEx and

1 couriers for general shipment of documents and transmission of document  
2 requests.

3 c. Computer Research: \$1,537.97. This category includes out-of-pocket payments  
4 to vendors such as Westlaw and PACER. These online resources were used to  
5 obtain access to court filings and conduct legal research and cite-check briefs  
6 in connection with the Action. These expenses represent the actual costs  
7 incurred at a charge set by the vendors and vary depending upon the type of  
8 services requested.

9 d. Photocopying & Printing: \$230. This category includes out-of-pocket payments  
10 to vendors to produce courtesy copies.

11 **IV. CONCLUSION**

12 20. Attached as Exhibit 10 is BFA's firm resume, which includes further biographical  
13 information about the attorneys and professional support staff, as well as information about the  
14 firm's philosophy, organization, and successes.

15 21. Electronic copies of the Excel spreadsheets for the charts at Exhibits 4, 5, and 6,  
16 will be lodged with the Court. We will provide the Court with any further documentation or  
17 explanation with respect to our lodestar fees or expenses, including detailed daily time records,  
18 upon request by the Court.

19 \* \* \*

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct.

3 Executed this 11th day of October, 2022 in Oakland, California.

4 Respectfully Submitted,

5   
6 \_\_\_\_\_  
7 Lesley E. Weaver

8 **BLEICHMAR FONTI & AULD LLP**

9 555 12th Street, Suite 1600

10 Oakland, CA 94607

11 Tel.: (415) 445-4003

12 Fax: (415) 445-4020

13 lweaver@bfalaw.com

14 *Liaison Counsel*  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

# **Exhibit 1**

## EXHIBIT 1

*In re Twitter Inc. Securities Litigation*, No. 4:16-cv-05314-JST (SK)

**Bleichmar Fonti & Auld LLP**  
**Summary Lodestar Chart**  
**November 14, 2016 - September 20, 2021**

Name	Position	Total Hours	Current Rate	Historical Lodestar	Current Lodestar	Brief Summary of Work Performed
Fonti, Joseph	Partner	167.50	\$985	\$147,445.00	\$164,987.50	Day-to-day oversight of the litigation; Lead Plaintiff Motion and Hearing; Complaint; Opposition to Motion to Dismiss and Motion for Judicial Notice; Mediation and Settlement
Meeks, Wilson	Partner	25.50	\$775	\$18,870.00	\$19,762.50	Opposition to Motion to Dismiss and Motion for Judicial Notice
Weaver, Lesley	Partner	186.00	\$1,050	\$150,631.25	\$195,300.00	Day-to-day oversight of the litigation; Lead Plaintiff Motion and Hearing; Complaint; Opposition to Motion to Dismiss and Motion for Judicial Notice; Trial Preparation; Mediation and Settlement
Simnowitz, Sara	Special Counsel	19.50	\$780	\$13,311.25	\$15,210.00	Staffing and managing workflows; deposition preparation; trial preparation; Mediation and Settlement
Aldridge, Emily	Associate	19.75	\$625	\$11,352.50	\$12,343.75	Discovery litigation
Cibulka, Britt	Associate	24.50	\$470	\$11,515.00	\$11,515.00	Discovery litigation and case management
Dennany, Nicholas	Associate	22.00	\$605	\$10,392.50	\$13,310.00	Lead Plaintiff Motion; Complaint; case starting activities
Desai, Mili	Associate	22.50	\$535	\$12,037.50	\$12,037.50	Lead Plaintiff Motion; Complaint; Opposition to Motion to Dismiss
English, Robyn	Associate	61.50	\$535	\$32,902.50	\$32,902.50	Opposition to Motion for Judicial Notice
McMenomy, Jennifer	Associate	25.50	\$390	\$9,945.00	\$9,945.00	Discovery
Moody, Janelle	Associate	1,092.00	\$475	\$503,593.75	\$518,700.00	Discovery; discovery litigation; deposition preparation
Robertson, Kelsey	Paralegal	11.25	\$350	\$3,622.50	\$3,937.50	Discovery and notices of appearance
Wax, David	Associate	660.50	\$415	\$238,016.25	\$274,107.50	Discovery and deposition preparation
Weiler, Matthew	Associate	153.75	\$655	\$96,468.75	\$100,706.25	Assisted with Complaint; discovery
<b>TOTALS:</b>		<b>2,491.75</b>		<b>\$1,260,103.75</b>	<b>\$1,384,765.00</b>	

# **Exhibit 2**

**BLEICHMAR FONTI & AULD LLP – ATTORNEYS**  
**Principal Tasks**

→ Partners

**Joseph Fonti (167.5 hours):** Mr. Fonti was involved in oversight of this Action from November 2016 through September 2021, beginning with the lead plaintiff process. He reviewed and analyzed motion papers and routinely engaged in discussions with Class Counsel. Mr. Fonti participated in developing case strategy. He performed an analysis of the merits of the case and gathered factual evidence in support of the drafting of the Amended Complaint. He was involved in briefing the Opposition to Defendant's Request for Judicial Notice including conducting research, developing arguments, reviewing, and revising motion papers, and participating in oral argument before the Court. In addition, he was involved in discovery conferences, and provided feedback and revisions to discovery requests and ESI protocols. Mr. Fonti provided comments and revisions on the Motion for Class Certification and was also involved in mediation negotiations.

**Wilson Meeks (25.5 hours):** Mr. Meeks provided significant revisions and analysis regarding the opposition briefing to Defendants' Motion to Dismiss. He was also involved in briefing the Opposition to Defendant's Request for Judicial Notice.

**Lesley Weaver (186.0 hours):** Ms. Weaver was involved in the oversight and management of this Action from November 2016 through September 2021. She performed an initial analysis of the legal merits of the case and was involved with the lead plaintiff motion process. She reviewed and revised motion papers, engaged in discussions with Mr. Fonti and Class Counsel, and participated in oral arguments before the Court. Ms. Weaver participated in drafting the Oppositions to Defendants' Motion to Dismiss and Request for Judicial Notice and oversaw both filings. She also organized and participated in case strategy calls with Class Counsel as well as engaged in meet-and-confers with opposing counsel related to discovery disputes. Ms. Weaver undertook revising and finalizing discovery requests and responses and engaged in related discovery disputes. Ms. Weaver also was involved in briefing class certification and participated in oral argument before the Court. She was actively involved in mediation negotiations and assisted with trial preparation.

→ Special Counsel

**Sara Simnowitz (19.5 hours):** Ms. Simnowitz analyzed and provided insight on various research issues. Ms. Simnowitz also assisted with deposition preparation of defendants, including reviewing relevant documents and memorandum. Ms. Simnowitz further handled case management workflows and logistics for trial preparation.

→ Associate Attorneys

**Emily Aldridge (19.75 hours):** Ms. Aldridge finalized and handled multiple case filings, including the opposition to Defendants' Request for Judicial Notice, the Motion for Class Certification, and various notices, stipulations, case management statements, and administrative motions. In addition, she reviewed and revised Plaintiffs' initial disclosures and discovery requests, as well as conducted legal research in connection with discovery disputes.



**Britt Cibulka (24.5 hours):** Ms. Cibulka performed work in connection with discovery. This included conducting factual and legal research regarding ESI protocols, drafting related discovery requests and responses, providing edits to deposition notices and correspondence, analyzing proposed search strings, and reviewing produced documents. She also attended discovery-related case management conferences, as well as meetings and conferences, both internal and with Class Counsel.

**Nicholas Dennany (22.0 hours):** Mr. Dennany conducted research and evaluated potential claims for the Consolidated Amended Complaint. Dennany reviewed analyst data and conducted factual investigation for the Consolidated Amended Complaint.

**Mili Desai (22.5 hours):** Ms. Desai conducted factual and legal research in connection with the Consolidated Amended Complaint. She also provided support in connection with the preparation, editing, and filing of the Opposition to Defendants' Motion to Dismiss.

**Robyn English (61.5 hours):** Ms. English researched and analyzed new factual developments connected to the Consolidated Amended Complaint and drafted numerous memoranda on noteworthy findings. She undertook a primary role in researching for, drafting, revising, and finalizing the Opposition to Defendants' Judicial Notice Request.

**Jennifer McMenomy (25.5 hours):** Ms. McMenomy drafted and analyzed discovery requests and responses. She also assisted with filings and other litigation tasks.

**Janelle Moody (1092.0 hours):** Ms. Moody played a significant role in document discovery. In addition to reviewing and analyzing thousands of documents, Ms. Moody also performed a second level analysis of selected documents, prepared targeted searches in preparation of Defendants' depositions, and drafted numerous memoranda regarding document analysis. Ms. Moody reviewed and analyzed deposition transcripts in support of management of discovery and deposition preparation. She also participated in various discovery calls with Class Counsel.

**David Wax (660.5 hours):** Mr. Wax played a meaningful role with regard to the discovery phase of the litigation. Mr. Wax reviewed and analyzed thousands of documents in preparation for Defendants' depositions, and upon the taking of Defendants' depositions, he then analyzed and summarized the deposition transcripts. He also conducted legal research in anticipation of various motion briefing throughout the case.

**Matthew Weiler (153.75 hours):** Mr. Weiler assisted with drafting and revising initial disclosures and case management conference statements and attended case management conferences. Mr. Weiler also finalized and filed various case documents. He participated in case strategy calls with Class Counsel. Mr. Weiler conducted research regarding disclosure of confidential witnesses during discovery. He also researched, drafted, and revised deposition notices, discovery requests and responses, discovery memos, and letter briefs on discovery disputes.

**BLEICHMAR FONTI & AULD LLP – SUPPORT STAFF**  
**Principal Tasks**

→ Paralegal

**Kelsey Robertson (11.25 hours):** Ms. Robertson performed paralegal work, including drafting notices of appearances and assisting with deposition preparation.

# **Exhibit 3**

## TEAM BIOGRAPHIES

**LESLEY E. WEAVER**  
*Partner*

Oakland

- Email: [lweaver@bfalaw.com](mailto:lweaver@bfalaw.com)
- Tel: +1 415 455 4004
- [www.bfalaw.com/professionals/lesley-weaver](http://www.bfalaw.com/professionals/lesley-weaver)

Lesley E. Weaver leads the Firm's Antitrust and Consumer Litigation Practice. Lesley joined BFA as a partner in 2016, opening the Firm's California office. In her twenty-year career, Lesley has focused primarily on cases that protect the public interest, consumers, and public entities. She has substantial leadership experience litigating complex antitrust and consumer-oriented class litigation, and has been appointed to leadership positions in some of the largest class actions in the country. In 2021, Lesley was named to The National Trial Lawyers list of the Top 100 Civil Plaintiff Trial Lawyers in California for her superior skills and qualifications. In 2018, Lesley was honored as a "California Lawyer of the Year" ("CLAY") for her work in *In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation* and was recognized as a "Plaintiff Trailblazer" by the National Law Journal (2018). In 2017 and 2018, she was named a "Super Lawyer" in the field of Class Action & Mass Torts Attorneys.

In July 2018, Judge Chhabria of the Northern District of California appointed Lesley as co-lead counsel for plaintiffs in *In re Facebook, Inc. Consumer Privacy User Profile Litigation*. This high-profile case seeks redress for Facebook users in the U.S and U.K. whose content specifically marked private was shared with thousands of third parties with no oversight and for the purpose of creating revenue for Facebook only. The more than four-hundred-page complaint documents how Facebook violated consumer fraud and privacy laws in allowing hundreds of third party apps, including Cambridge Analytica, to bundle and sell Facebook users' private information without their knowledge or consent.

In June 2017, Judge Edward M. Chen appointed Lesley to the Plaintiffs' Steering Committee in *In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices, and Products Liability Litigation*. Lesley worked closely with technical experts in that matter to determine if proposed fixes to the subject vehicles inflict additional damages upon class members. In May 2019, Plaintiffs secured final approval of a settlement of \$307.5 million in cash as well as extended warranties.

In December 2017, Judge Charles R. Breyer appointed Lesley to the Plaintiffs' Steering Committee in *In re German Automotive Manufacturers Antitrust Litigation*. Consumers and suppliers allege that German automakers engaged in a 20-year cartel—the single largest known automobile cartel in U.S. and European history—to suppress the development of technology in their automobiles.

In 2015, Judge Charles R. Breyer appointed Lesley to the Plaintiffs' Steering Committee in *In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation*. Lesley's leadership position in this litigation included spearheading the investigation that ultimately uncovered German auto supplier Robert Bosch GmbH's significant role in multiple schemes to place software in vehicles purposely designed to

## TEAM BIOGRAPHIES

---

evade emissions laws. Plaintiffs in the Volkswagen litigation have recovered approximately \$15 billion for class members and the environment, the largest automotive class action recovery ever.

She represents the Cities of Palo Alto and Richmond, California in a municipal subclass in *In re Lithium Ion Batteries Antitrust Litigation*. In *In re Automotive Parts Antitrust Litigation*, Lesley represented Oakland County, Michigan; Traverse City, Michigan; the Village of Northport, New York; Mecklenburg County, North Carolina; and Richmond, California in the case against manufacturers of wire harnesses that settled on a non-class basis far in excess of the entities' actual damages.

Lesley recently represented the National Black Farmers' Association ("NBFA"), pro bono, in challenging the terms of the proposed merger between BB&T and SunTrust Bank. In 2019, she testified on behalf of the NBFA at the joint public hearing held by the Federal Reserve Board and the Federal Deposit Insurance Corporation advocating for terms that will better serve small farmers. As a condition of securing merger approval from the Department of Justice, the banks have since agreed to sell off 28 branches in regions that BFA identified.

In addition, Lesley has extensive experience representing sophisticated institutional investors in landmark securities actions. Some of those cases include *In re Marsh & McLennan Cos., Inc. Securities Litigation* (\$400 million settlement); *In re Cavanaugh Securities Litigation* (including an appeal to the Ninth Circuit concerning the method of selecting lead plaintiff and lead counsel after the enactment of the Private Securities Litigation Reform Act ("PSLRA")); *In re Cardinal Health Inc. Securities Litigation* (\$600 million settlement); and *In re Cisco Systems, Inc. Securities Litigation* (\$99 million settlement).

Lesley's extensive trial experience has spanned her career. In October 2014, Lesley tried an internet privacy case against a Chinese-owned, California-based internet site, recovering 100 percent of economic damages and a \$15 million punitive damages jury verdict, as well as significant injunctive relief. Her first trial was in 1998 before the Honorable Vaughn Walker on behalf of Amanda Buritica, a U.S. citizen born in Colombia who was unlawfully detained by U.S. Customs at San Francisco International Airport; that case resulted in the largest verdict at the time under the Federal Tort Claims Act.

Lesley is committed to public service through volunteer efforts, and currently serves on the Advisory Council of the East Bay Community Law Center, as well as the Executive Committee of the Securities Section for the Bar Association of San Francisco. She is a past Co-Chair of the San Francisco LGBT Community Center, a past Co-Chair of Bay Area Lawyers for Individual Freedom, a past National Chair of the National Center for Lesbian Rights, and a past Vice President and Director of the Board of the Frameline Film Festival. She has previously served on the boards of Women Lawyers of Alameda County, Equality California, the International Gay and Lesbian Human Rights Commission, and the Alice B. Toklas Democratic Club. She also is a member of the National Association of Public Pension Attorneys (NAPPA).

Lesley serves on the drafting committee for the Sedona Conference Data Privacy Primer

## TEAM BIOGRAPHIES

on Biometrics and is a frequent speaker on privacy-related topics. She is a recurring participant in the “Masters of Litigation” conference taught at West Virginia Law School, and has spoken at the Northern District of California Judicial Conference. She is an acting Lawyer Representative for the Northern District of California and an active member of the Executive Committees of the CyberSecurity, Privacy, and Securities committees for the Bar Association of San Francisco. She is also a co-author of the George Washington Law School’s Inklusivity and Excellence: Guidelines and Best Practices for Judges Appointing Lawyers to Leadership Positions in MDL and Class Action Litigation.

Lesley holds degrees from the University of Bonn (Germany) and Harvard College, and received a J.D. from the University of Virginia Law School (1997). She attended high school at Haderslev Katedraleskole in Denmark. She speaks German and Danish, and is proficient in French.

Lesley is admitted to practice in California (1997), the U.S. Court of Appeals for the Ninth Circuit (1998), and the U.S. District Courts for the Northern District (1997) and the Eastern, Central, and Southern Districts of California (1998) and the Eastern District of Michigan (2019).

<p><b>JOSEPH A. FONTI</b> <i>Partner</i></p>	<p>New York</p>	<ul style="list-style-type: none"> <li>• Email: <a href="mailto:jfonti@bfalaw.com">jfonti@bfalaw.com</a></li> <li>• Tel: +1 212 789 1342</li> <li>• <a href="http://www.bfalaw.com/professionals/joseph-fonti">www.bfalaw.com/professionals/joseph-fonti</a></li> </ul>
--	-----------------	---

Joseph A. Fonti leads the Firm’s U.S. Securities Litigation team. He has nearly twenty years of experience in prosecuting complex litigations on behalf of institutional investors. His commitment to clients, advocacy skills, and litigation results have resulted in Joseph being “recommended” in the field of securities litigation by the Legal 500.

Joseph currently leads the BFA teams prosecuting class actions led by our clients against Teva Pharmaceutical Industries, Ltd. and Citigroup, Inc.

Joseph previously served as co-lead counsel in *In re Genworth Financial Inc. Securities Litigation* in the Eastern District of Virginia – widely known as the “rocket docket.” Joseph led the litigation to a remarkable recovery for the class in the amount of \$219 million, the largest securities class action recovery ever achieved in that jurisdiction. In defeating defendants’ motion to dismiss, Joseph secured one of the first pro-investor opinions after the Supreme Court’s recent decision in the Omnicare matter. Joseph already had notable success in the high-pressure environment of the E.D. Va. In 2013, as lead trial lawyer on behalf of shareholders of Computer Science Corp., after prevailing at class certification and only four weeks before trial in the CSC matter, Joseph and his team secured a \$97.5 million settlement – the second-largest cash securities settlement in the court’s history.

Joseph also contributed to the prosecution and ultimate resolution of the Weatherford securities litigation (*Freedman v. Weatherford International Ltd., et al.*). Joseph’s contribution to this very intense litigation centered on complex accounting and expert

## TEAM BIOGRAPHIES

---

matters, and he took trial testimony of several third-party accountants and consultants who were not expected to appear for trial. Joseph, as part of the team led by partner Javier Bleichmar, contributed to an outstanding recovery of \$120 million for Weatherford shareholders.

With over a dozen years of experience in investor litigation, Joseph's career is also marked by significant successes in the area of auditor liability and stock options backdating. For example, he represented shareholders in the \$671 million recovery in *In re HealthSouth Securities Litigation*. Particularly, Joseph played a significant role in recovering \$109 million from HealthSouth's outside auditor Ernst & Young LLP, one of the largest recoveries to date against an auditing firm. He also contributed to securing a \$173.5 million settlement in *In re Broadcom Corp. Securities Litigation*, which, at the time, was the second-largest cash settlement involving a company accused of options backdating. This was the only such case in which claims against the auditors were sustained.

In addition to representing several of the most significant U.S. institutional investors, Joseph has represented a number of Canada's most significant pension systems and asset managers. He also provides thought leadership on issues of particular relevance to these clients. For example, he co-authored "Cross-Listed Securities Cases Present Challenges," for the National Law Journal, (May 30, 2016), which addresses recent Morrison interpretations in light of modern financial markets. He also led the prosecution of *In re NovaGold Resources Inc. Securities Litigation*, which resulted in the largest settlement under Canada's securities class action laws.

Additionally, Joseph has achieved notable success as an appellate advocate. He successfully argued before the Second Circuit Court of Appeals in *In re Celestica Inc. Securities Litigation*. The Second Circuit reversed an earlier dismissal and turned the tide of recent decisions by realigning pleading standards in favor of investors. Joseph was also instrumental in the advocacy before the Ninth Circuit Court of Appeals in *In re Broadcom Corp. Securities Litigation*. This appellate victory marked the first occasion a court sustained allegations against an outside auditor related to options backdating.

Prior to founding the firm, Joseph was a Partner of Labaton Sucharow LLP. He also practiced securities litigation at Bernstein Litowitz Berger & Grossmann LLP, and began his legal career at Sullivan & Cromwell LLP, where he represented Fortune 100 corporations and financial institutions in complex securities litigation, in multifaceted SEC investigations, and at trial.

Joseph is a member of the ABA, the NY State Bar Association, the Bar of the City of New York, and the National Association of Public Pension Attorneys (NAPPA).

Joseph earned a B.A., cum laude, from New York University and a J.D. from New York University School of Law (1999), where he was a member of the Marden Moot Court. He is admitted to practice in New York (2000), the U.S. Supreme Court (2007), and the U.S. Courts of Appeals for the Second Circuit (2010), Ninth Circuit (2007), and Tenth Circuit (2013). He also is admitted in the U.S. District Courts for the Southern and Eastern Districts of New York (2001).



## TEAM BIOGRAPHIES

**SARA SIMNOWITZ**  
*Special Counsel*

New York

- Email: [ssimnowitz@bfalaw.com](mailto:ssimnowitz@bfalaw.com)
- Tel: +1 212 789 2309
- [www.bfalaw.com/sara-simnowitz](http://www.bfalaw.com/sara-simnowitz)

Sara Pildis Simnowitz is Special Counsel at BFA, prosecuting a variety of complex litigations.

Sara Simnowitz has nearly twenty years of experience in all aspects of litigating complex matters. Sara is dedicated to prosecuting securities, antitrust, and consumer fraud class actions on behalf of institutional, municipal, and individual clients. Sara draws on her extensive litigation experience while playing a key role in prosecuting the Firm's antitrust and consumer cases, including *In re: Facebook, Inc. Consumer Privacy User Profile Litigation*.

Sara is also a central member of the team prosecuting *Ontario Teachers' Pension Plan Board, et al. v. Teva Pharmaceutical Industries Ltd. et al.*, and prosecuted *In re Genworth Financial Securities Litigation* on behalf of Her Majesty the Queen in Right of Alberta in the Eastern District of Virginia.

Before joining BFA, Ms. Simnowitz was a senior associate at Arnold & Porter LLP, where she focused on complex commercial litigation. She previously practiced at Heller Ehrman LLP in New York and Foley Hoag LLP in Massachusetts, where she focused on complex commercial and securities litigation.

Sara earned a B.A., *summa cum laude*, from Brandeis University, a J.D. from the University of Chicago Law School (2001), and an M.A. from the London School of Economics and Political Science (2002). She is admitted to practice in Massachusetts (2002), New York (2006), the U.S. Supreme Court (2008), the U.S. Court of Appeals for the First Circuit (2003), and the U.S. District Courts for the District of Massachusetts (2002), the Southern and Eastern Districts of New York (2006), and the Western District of New York (2008).

**NICHOLAS DENNANY**  
*Associate*

New York

- Email: [ndennany@bfalaw.com](mailto:ndennany@bfalaw.com)
- Tel: +1 212 789 1354
- [www.bfalaw.com/nicholas-dennany](http://www.bfalaw.com/nicholas-dennany)

Nicholas Dennany focuses his practice on investigating and analyzing pending and potential securities fraud and derivative claims and assists the Firm advise and recommend strategies to its clients to ensure that their rights are protected. Nick is also a member of the Firm's litigation team and has more than a decade of litigation experience, with specific expertise in discovery matters and managing large-scale electronic document reviews.

Nick was a member of the team that prosecuted *Genworth Financial* in the notoriously fast-paced jurisdiction of the Eastern District of Virginia. The case alleged that the defendants misled investors about the true state of the company's deteriorating long-

## TEAM BIOGRAPHIES

term care business. BFA recovered \$219 million for investors – the largest ever class action settlement in Virginia.

Nick was also a key contributor to the Firm's recent success in *MF Global*, in connection with the company's dramatic collapse on October 31, 2011. The plaintiffs secured several settlements totaling more than \$234 million, resolving claims against MF Global's former officers and directors, several underwriter defendants, and MF Global's outside auditor.

Prior to joining the Firm, Nick worked with many of the attorneys now at BFA while at Labaton Sucharow LLP, where he was a member of the team that successfully prosecuted securities claims *In re Broadcom Corp. Securities Litigation* (\$173.5 million settlement) and *In re NovaGold Resources Inc. Securities Litigation* (\$26.6 million settlement).

Nick earned a B.A., *cum laude*, from the University of Florida and a J.D. from the University of Florida, Levin College of Law (2004). He is admitted to practice in New York (2006).

**JANELLE MOODY**  
*Projects Associate*

Oakland

- Email: [jmoody@bfalaw.com](mailto:jmoody@bfalaw.com)
- Tel: +1 415 445 4006
- [www.bfalaw.com/janelle-moody](http://www.bfalaw.com/janelle-moody)

Janelle Moody joined the Firm in 2016 and is currently a Projects Associate in BFA's Oakland office. Janelle brings extensive experience in all phases of litigation to the Firm. She currently plays a significant role in managing discovery in *In re Facebook, Inc. Consumer Privacy User Profile Litigation*. Her role of providing strategic discovery advice was integral in the negotiation of electronic discovery issues in the *In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices, and Products Litigation*.

Janelle earned her J.D. from Northwestern School of Law at Lewis and Clark College (1997) and is admitted to practice in California (2003) and Oregon (1998).

**DAVID WAX**  
*Staff Associate*

New York

- Email: [dwax@bfalaw.com](mailto:dwax@bfalaw.com)
- [www.bfalaw.com/professionals/david-wax](http://www.bfalaw.com/professionals/david-wax)

David Wax has significant experience litigating complex matters in New York Federal and State Courts.

David focuses his practice on the discovery phase of complex commercial litigations and has played a meaningful role supporting the litigation teams in the Firm's securities, antitrust and consumer class action practice groups.

Prior to joining BFA Mr. Wax was an associate at a large New York law firm where he focused his practice on class actions, insurance and contractual disputes, and complex judicial foreclosures.

David earned his J.D. from Fordham University School of Law (2008) and is admitted to practice in New York (2009) and the Southern and Eastern District of New York (2009).

## TEAM BIOGRAPHIES

---

### Wilson Meeks

Wilson ("Bill") Meeks III concentrated his practice on prosecuting complex securities fraud cases on behalf of institutional investors.

Bill played a key role litigating *In re Genworth Financial Securities Litigation*, 3:14-cv-00682 (JAG), on behalf of Her Majesty the Queen in Right of Alberta in the notoriously fast-paced jurisdiction of the Eastern District of Virginia. On May 1, 2015, U.S. District Judge James R. Spencer denied defendants' motion to dismiss, ruling that plaintiffs had sufficiently pled securities fraud claims against Genworth and its CEO and CFO. Bill spearheaded the Firm's discovery efforts, which were conducted at an accelerated pace.

Previously, Bill was the senior associate on the team that prosecuted securities litigation against Weatherford International Ltd. on behalf of the Anchorage Police & Fire Retirement System (*Freedman v. Weatherford International Ltd., et al.*), helping to lead the team that developed the substantive allegations. The case alleged that Weatherford, which made three restatements of audited financials totaling approximately \$1 billion, misled investors about the Company's tax accounting. After more than three years of intense litigation, including 22 depositions and complex expert testimony, plaintiffs reached an outstanding recovery of \$120 million on behalf of shareholders.

Prior to joining the firm, Bill was an associate at Labaton Sucharow LLP, where he also prosecuted financial litigation matters on behalf of institutional investors. He previously worked at Akin Gump Strauss Hauer & Feld LLP, where he focused on complex securities, commercial and bankruptcy litigation.

Bill completed judicial clerkships with the Honorable James Robertson of the United States District Court for the District of Columbia, as well as with the Honorable Dolores K. Sloviter of the United States Court of Appeals for the Third Circuit.

Bill received his J.D. from Columbia Law School where he was a James Kent Scholar, and was awarded both the Milton B. Conford Book Prize in Jurisprudence and the Samuel I. Rosenman Prize.

### Emily Aldridge

Emily was responsible for client counseling; developing case strategy; evaluating claims; coordinating e-discovery; investigating and analyzing facts and evidence; drafting pleadings, briefs, memoranda, and contracts; preparing for and participating in court hearings, witness interviews, depositions, mediation, and arbitration; retaining and supervising expert witnesses; and negotiating settlements.

Prior to joining BFA, Emily was a litigation associate at Gibson, Dunn & Crutcher LLP, where her practice included complex commercial litigation, securities litigation, and defense of compliance and white collar investigations, as well as a wide variety of pro bono matters.

Emily earned a B.A., magna cum laude, in cursu honorum, from Fordham University and a J.D. from Fordham University School of Law (2011), where she served as a Notes and

## TEAM BIOGRAPHIES

---

Articles Editor of the Fordham Law Review. She also completed a judicial clerkship with the Honorable Denny Chin of the U.S. Court of Appeals for the Second Circuit. She is proficient in German.

### Britt Cibulka

Britt managed multiple document and privilege reviews, and contributed to multiple trial teams, using her expertise to identify case-critical documents and managing their use through deposition and trial. Britt also provided privilege law training to in-house counsel and numerous attorney review teams.

Britt assisted in *litigating In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation*. Working in coordination with the Department of Justice, the California Attorney General, and the Federal Trade Commission, Plaintiffs secured settlements totaling over \$15.7 billion covering over 465,000 Volkswagen 2.0L diesel car owners, and continue to pursue relief for over 85,000 owners of 3.0L Volkswagen, Audi and Porsche diesel cars.

Prior to joining BFA, Britt was an Attorney at Wilson, Sonsini, Goodrich & Rosati in Palo Alto, California, where she managed multiple privilege reviews and conducted pre-trial discovery for intellectual property and white collar criminal cases. Previously, she contracted with Google's in-house legal discovery team, where she managed large and complex privilege reviews for antitrust, intellectual property, and securities cases. She was also a member of several trial teams at Morrison & Foerster, where she contributed to the successful defense of clients from initial production through trial.

### Mili Desai

As an experienced litigator, Mili was dedicated to prosecuting antitrust and consumer fraud class actions on behalf of a variety of institutional, municipal, and individual clients. She was a key member of the team suing several contact lens manufacturers for an alleged retail price maintenance scheme in *In re Disposable Contact Lens Antitrust Litigation*, and also had significant responsibility on the team prosecuting the large-scale emissions fraud perpetrated by Volkswagen and other defendants in *In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litig.*

Prior to joining BFA, Mili was an associate at Akin Gump Strauss Hauer & Feld, litigating on behalf of creditors and debtors in the bankruptcy process, representing senior executives of financial institutions before various government prosecutors and regulators, and litigating complex commercial disputes. Previously, Ms. Desai worked at Willkie Farr & Gallagher, gaining experience in antitrust, white collar, and commercial litigation.

Mili received her J.D. from Harvard Law School, and graduated magna cum laude from the University of Texas with a BBA in Finance and a BA in English.

## TEAM BIOGRAPHIES

---

### Robyn English

Robyn English brought a background in investment litigation as well as clerkship experience to her role as an associate on BFA's litigation team, and was dedicated to litigating complex securities fraud and investment-related matters on behalf of institutional investors.

Prior to joining BFA, Robyn was an associate at Paul, Weiss, Rifkind, Wharton & Garrison, where she litigated complex investment-related disputes. She previously worked at Kirkland and Ellis, LLP, where she focused on antitrust, commercial, and bankruptcy litigation. Robyn completed a judicial clerkship with the Honorable Beryl A. Howell, Chief Judge of the United States District Court for the District of Columbia. She received her J.D. from Georgetown University Law Center.

Robyn graduated Phi Beta Kappa from Georgetown University, where she was a member of Georgetown's NCAA Women's Golf Team.

### Jennifer McMenomy

Jennifer focused her practice on civil litigation, and was dedicated to litigating complex disputes. Jennifer assisted in *In re Domestic Airlines Travel Antitrust Litigation*, where Plaintiffs settled for \$15 million with Defendant Southwest Airlines and \$45 million with Defendant American Airlines.

Prior to joining BFA, Jennifer was an associate at Alverson Taylor Mortensen & Sanders. Jennifer received her J.D. from Western State University College of Law (2014).

### Matthew Weiler

Matthew Weiler litigated complex matters in both federal and California state courts, and focused his practice on complex commercial litigation, including antitrust, consumer, and securities actions. He was selected as a "Super Lawyer" and named a "Rising Star" in Northern California by Thomson Reuters.

Matthew primarily prosecuted antitrust actions at present, representing individuals, companies, and investors who have been harmed by fraud and unfair business practices. He litigated claims against German car manufacturers, the self-named Fünfer-Kreise (Circle of Five), alleging the largest known single automobile cartel in U.S. and European history.

Prior to joining BFA, Matthew was an integral member of the team that collected \$399 million in settlements for California purchasers of the drug Cipro, one of the largest cash settlements ever achieved under California antitrust law. Matthew also helped obtain settlements on behalf of direct purchasers of capacitors from members of an international price-fixing cartel, and previously pursued monopolization claims against the United Fighting Championship. Matthew additionally has experience with Foreign Sovereign Immunity Act litigation.

## TEAM BIOGRAPHIES

---

Matthew earned a B.A. from the University of Michigan, where he was a James B. Angell Scholar, and a J.D., cum laude, from the University of Michigan Law School (2004).

### Kelsey Robertson

Kelsey worked on numerous securities, consumer, and antitrust litigation matters while at BFA, including *In re Twitter Inc. Securities Litigation*, *In re Facebook, Inc. Consumer Privacy User Profile Litigation*, *In re Volkswagen “Clean Diesel” Marketing, Sales Practices, and Products Liability Litig.*, and *In re Disposable Contact Lens Antitrust Litigation*.

Prior to joining the firm in 2018, Kelsey was a legal secretary at Gibson, Dunn & Crutcher LLP.

EDUCATION: Mills College, B.A., 2015

# **Exhibit 4**



EXHIBIT 4

*In re Twitter Inc. Securities Litigation* , No. 4:16-cv-05314-JST (SK)

**Bleichmar Fonti & Auld LLP**  
**Category Lodestar Chart by Timekeeper and Month**  
**November 14, 2016 - September 20, 2021**

**Category Codes:**

1. Factual Investigation

2. Discovery (Fact & Expert)

3. Briefs, Pretrial Motions & Legal Research

4. Court Appearances

5. Initial or Amended Complaint

6. Client / Shareholder Communications
7. Litigation Strategy & Analysis

8. Settlement Negotiations, Stipulation, Plan of Allocation

9. Appeal

10. Trial Preparation

11. Case Management

TIMEKEEPER	1	2	3	4	5	6	7	8	9	10	11	TOTAL SUM OF HOURS	HISTORIC RATE	LODESTAR AT HISTORIC RATE	CURRENT RATE	LODESTAR AT CURRENT RATE
<b>Aldridge, Emily - Associate</b>												<b>19.75</b>		<b>\$11,352.50</b>		<b>\$12,343.75</b>
August 2017		0.5	1									1.5	\$560.00	\$840.00	\$625.00	\$937.50
October 2017		2										2	\$560.00	\$1,120.00	\$625.00	\$1,250.00
December 2017		4.5										4.5	\$560.00	\$2,520.00	\$625.00	\$2,812.50
January 2018		0.5									1	1.5	\$560.00	\$840.00	\$625.00	\$937.50
February 2018			2.75									2.75	\$560.00	\$1,540.00	\$625.00	\$1,718.75
March 2018											1.75	1.75	\$560.00	\$980.00	\$625.00	\$1,093.75
May 2018											0.25	0.25	\$560.00	\$140.00	\$625.00	\$156.25
December 2018		0.5									0.5	1	\$560.00	\$560.00	\$625.00	\$625.00
April 2019		4.5										4.5	\$625.00	\$2,812.50	\$625.00	\$2,812.50
<b>Cibulka, Britt - Associate</b>												<b>24.5</b>		<b>\$11,515.00</b>		<b>\$11,515.00</b>
November 2017		4.75										4.75	\$470.00	\$2,232.50	\$470.00	\$2,232.50
December 2017		1.5									3	4.5	\$470.00	\$2,115.00	\$470.00	\$2,115.00
January 2018		8.75									6	14.75	\$470.00	\$6,932.50	\$470.00	\$6,932.50
February 2018		0.5										0.5	\$470.00	\$235.00	\$470.00	\$235.00
<b>Dennany, Nicholas - Associate</b>												<b>22</b>		<b>\$10,392.50</b>		<b>\$13,310.00</b>
November 2016	7.25											7.25	\$470.00	\$3,407.50	\$605.00	\$4,386.25
December 2016	9.75				1.5							11.25	\$470.00	\$5,287.50	\$605.00	\$6,806.25
January 2017					0.5							0.5	\$485.00	\$242.50	\$605.00	\$302.50
February 2017					0.75							0.75	\$485.00	\$363.75	\$605.00	\$453.75
May 2017					1.5							1.5	\$485.00	\$727.50	\$605.00	\$907.50
July 2017			0.5									0.5	\$485.00	\$242.50	\$605.00	\$302.50
November 2017											0.25	0.25	\$485.00	\$121.25	\$605.00	\$151.25
<b>Desai, Mili - Associate</b>												<b>22.5</b>		<b>\$12,037.50</b>		<b>\$12,037.50</b>
November 2016	11.5				2.75							14.25	\$535.00	7623.75	\$535.00	7623.75
February 2017					0.25							0.25	\$535.00	133.75	\$535.00	133.75
March 2017					3							3	\$535.00	1605	\$535.00	1605
June 2017			4.5									4.5	\$535.00	2407.5	\$535.00	2407.5
July 2017					0.5							0.5	\$535.00	267.5	\$535.00	267.5
<b>English, Robyn - Associate</b>												<b>61.5</b>		<b>\$32,902.50</b>		<b>\$32,902.50</b>

EXHIBIT 4

*In re Twitter Inc. Securities Litigation* , No. 4:16-cv-05314-JST (SK)

Bleichmar Fonti & Auld LLP  
Category Lodestar Chart by Timekeeper and Month  
November 14, 2016 - September 20, 2021

Category Codes:

1. Factual Investigation

2. Discovery (Fact & Expert)

3. Briefs, Pretrial Motions & Legal Research

4. Court Appearances

5. Initial or Amended Complaint

6. Client / Shareholder Communications
7. Litigation Strategy & Analysis

8. Settlement Negotiations, Stipulation, Plan of Allocation

9. Appeal

10. Trial Preparation

11. Case Management

TIMEKEEPER	1	2	3	4	5	6	7	8	9	10	11	TOTAL SUM OF HOURS	HISTORIC RATE	LODESTAR AT HISTORIC RATE	CURRENT RATE	LODESTAR AT CURRENT RATE
December 2016					3							3	\$535.00	\$1,605.00	\$535.00	\$1,605.00
January 2017	0.25										0.5	0.75	\$535.00	\$401.25	\$535.00	\$401.25
February 2017	0.75											0.75	\$535.00	\$401.25	\$535.00	\$401.25
March 2017	1.5										2	3.5	\$535.00	\$1,872.50	\$535.00	\$1,872.50
April 2017											2.5	2.5	\$535.00	\$1,337.50	\$535.00	\$1,337.50
May 2017			50.75								0.25	51	\$535.00	\$27,285.00	\$535.00	\$27,285.00
Fonti, Joseph - Partner												167.5		\$147,445.00		\$164,987.50
November 2016	1.5				3.5		0.75					5.75	\$880.00	\$5,060.00	\$985.00	\$5,663.75
December 2016	3.5			19.25	6		0.75				0.25	29.75	\$880.00	\$26,180.00	\$985.00	\$29,303.75
January 2017					14						0.75	14.75	\$880.00	\$12,980.00	\$985.00	\$14,528.75
February 2017					25						0.75	25.75	\$880.00	\$22,660.00	\$985.00	\$25,363.75
March 2017					4.75		0.5				2	7.25	\$880.00	\$6,380.00	\$985.00	\$7,141.25
May 2017			17.75									17.75	\$880.00	\$15,620.00	\$985.00	\$17,483.75
June 2017			4.25									4.25	\$880.00	\$3,740.00	\$985.00	\$4,186.25
October 2017		6	0.75	7			2				3.75	19.5	\$880.00	\$17,160.00	\$985.00	\$19,207.50
November 2017		11.5					2					13.5	\$880.00	\$11,880.00	\$985.00	\$13,297.50
December 2017		3										3	\$880.00	\$2,640.00	\$985.00	\$2,955.00
January 2018		2.75										2.75	\$880.00	\$2,420.00	\$985.00	\$2,708.75
February 2018		2.5										2.5	\$880.00	\$2,200.00	\$985.00	\$2,462.50
March 2018		1.25										1.25	\$880.00	\$1,100.00	\$985.00	\$1,231.25
April 2018			2.75									2.75	\$880.00	\$2,420.00	\$985.00	\$2,708.75
May 2018			3.25									3.25	\$880.00	\$2,860.00	\$985.00	\$3,201.25
June 2018		0.5										0.5	\$880.00	\$440.00	\$985.00	\$492.50
July 2018			1.25								0.75	2	\$880.00	\$1,760.00	\$985.00	\$1,970.00
August 2018							0.25	3.75			0.75	4.75	\$880.00	\$4,180.00	\$985.00	\$4,678.75
September 2018								3.5				3.5	\$880.00	\$3,080.00	\$985.00	\$3,447.50
February 2019		2.25										2.25	\$895.00	\$2,013.75	\$985.00	\$2,216.25
April 2019		0.5					0.25					0.75	\$895.00	\$671.25	\$985.00	\$738.75
McMenomy, Jennifer - Associate												25.5		\$9,945.00		\$9,945.00
November 2017			1.5								0.5	2	\$390.00	\$780.00	\$390.00	\$780.00
December 2017		2			2.5							4.5	\$390.00	\$1,755.00	\$390.00	\$1,755.00

EXHIBIT 4

*In re Twitter Inc. Securities Litigation* , No. 4:16-cv-05314-JST (SK)

Bleichmar Fonti & Auld LLP  
Category Lodestar Chart by Timekeeper and Month  
November 14, 2016 - September 20, 2021

Category Codes:

1. Factual Investigation

2. Discovery (Fact & Expert)

3. Briefs, Pretrial Motions & Legal Research

4. Court Appearances

5. Initial or Amended Complaint

6. Client / Shareholder Communications
7. Litigation Strategy & Analysis

8. Settlement Negotiations, Stipulation, Plan of Allocation

9. Appeal

10. Trial Preparation

11. Case Management

TIMEKEEPER	1	2	3	4	5	6	7	8	9	10	11	TOTAL SUM OF HOURS	HISTORIC RATE	LODESTAR AT HISTORIC RATE	CURRENT RATE	LODESTAR AT CURRENT RATE
January 2018		10.5			4.5							15	\$390.00	\$5,850.00	\$390.00	\$5,850.00
February 2018					4							4	\$390.00	\$1,560.00	\$390.00	\$1,560.00
Meeks, Wilson - Partner												25.5		\$18,870.00		\$19,762.50
May 2017			8									8	\$740.00	\$5,920.00	\$775.00	\$6,200.00
June 2017			11		6.5							17.5	\$740.00	\$12,950.00	\$775.00	\$13,562.50
Moody, Janelle - Associate												1092		\$503,593.75		\$518,700.00
January 2018		8									1.5	9.5	\$450.00	\$4,275.00	\$475.00	\$4,512.50
February 2018		7.75	1									8.75	\$450.00	\$3,937.50	\$475.00	\$4,156.25
March 2018		7.5										7.5	\$450.00	\$3,375.00	\$475.00	\$3,562.50
April 2018			1.25								2.25	3.5	\$450.00	\$1,575.00	\$475.00	\$1,662.50
May 2018		35									0.5	35.5	\$450.00	\$15,975.00	\$475.00	\$16,862.50
June 2018		142.25									0.75	143	\$450.00	\$64,350.00	\$475.00	\$67,925.00
July 2018		147.5	1								1	149.5	\$450.00	\$67,275.00	\$475.00	\$71,012.50
August 2018		102.5					6.5	6.25			0.25	115.5	\$450.00	\$51,975.00	\$475.00	\$54,862.50
September 2018		63.5						10				73.5	\$450.00	\$33,075.00	\$475.00	\$34,912.50
October 2018		23.75					1.5				0.75	26	\$450.00	\$11,700.00	\$475.00	\$12,350.00
November 2018		12					0.25					12.25	\$450.00	\$5,512.50	\$475.00	\$5,818.75
December 2018		19.75										19.75	\$450.00	\$8,887.50	\$475.00	\$9,381.25
January 2019		103.75										103.75	\$475.00	\$49,281.25	\$475.00	\$49,281.25
February 2019		114.25										114.25	\$475.00	\$54,268.75	\$475.00	\$54,268.75
March 2019		45.25										45.25	\$475.00	\$21,493.75	\$475.00	\$21,493.75
April 2019		42.25										42.25	\$475.00	\$20,068.75	\$475.00	\$20,068.75
May 2019		21.25										21.25	\$475.00	\$10,093.75	\$475.00	\$10,093.75
June 2019		33.75										33.75	\$475.00	\$16,031.25	\$475.00	\$16,031.25
July 2019		12.25										12.25	\$475.00	\$5,818.75	\$475.00	\$5,818.75
August 2019		4.5					0.25				5.75	10.5	\$475.00	\$4,987.50	\$475.00	\$4,987.50
September 2019			36.5									36.5	\$475.00	\$17,337.50	\$475.00	\$17,337.50
October 2019		27.5	40.5									68	\$475.00	\$32,300.00	\$475.00	\$32,300.00
Robertson, Kelsey - Paralegal												11.25		\$3,622.50		\$3,937.50
July 2018		2.5									0.25	2.75	\$290.00	\$797.50	\$350.00	\$962.50

EXHIBIT 4

*In re Twitter Inc. Securities Litigation* , No. 4:16-cv-05314-JST (SK)

Bleichmar Fonti & Auld LLP  
Category Lodestar Chart by Timekeeper and Month  
November 14, 2016 - September 20, 2021

Category Codes:

1. Factual Investigation

2. Discovery (Fact & Expert)

3. Briefs, Pretrial Motions & Legal Research

4. Court Appearances

5. Initial or Amended Complaint

6. Client / Shareholder Communications
7. Litigation Strategy & Analysis

8. Settlement Negotiations, Stipulation, Plan of Allocation

9. Appeal

10. Trial Preparation

11. Case Management

TIMEKEEPER	1	2	3	4	5	6	7	8	9	10	11	TOTAL SUM OF HOURS	HISTORIC RATE	LODESTAR AT HISTORIC RATE	CURRENT RATE	LODESTAR AT CURRENT RATE
September 2018		0.5										0.5	\$290.00	\$145.00	\$350.00	\$175.00
December 2018		1		1								2	\$290.00	\$580.00	\$350.00	\$700.00
January 2019		0.5			0.25							0.75	\$350.00	\$262.50	\$350.00	\$262.50
February 2019		2			0.25						1	3.25	\$350.00	\$1,137.50	\$350.00	\$1,137.50
April 2019		0.25									0.5	0.75	\$350.00	\$262.50	\$350.00	\$262.50
September 2019					1.25							1.25	\$350.00	\$437.50	\$350.00	\$437.50
Simnowitz, Sara - Special Counsel												19.5		\$13,311.25		\$15,210.00
November 2016			3.5									3.5	\$640.00	\$2,240.00	\$780.00	\$2,730.00
December 2016					3							3	\$640.00	\$1,920.00	\$780.00	\$2,340.00
December 2017							0.5					0.5	\$640.00	\$320.00	\$780.00	\$390.00
January 2018		0.5										0.5	\$640.00	\$320.00	\$780.00	\$390.00
February 2018			0.75									0.75	\$640.00	\$480.00	\$780.00	\$585.00
March 2018											1.75	1.75	\$640.00	\$1,120.00	\$780.00	\$1,365.00
April 2018			1									1	\$640.00	\$640.00	\$780.00	\$780.00
December 2018			0.5									0.5	\$640.00	\$320.00	\$780.00	\$390.00
January 2019		1										1	\$675.00	\$675.00	\$780.00	\$780.00
February 2019		1										1	\$675.00	\$675.00	\$780.00	\$780.00
April 2019		0.75										0.75	\$675.00	\$506.25	\$780.00	\$585.00
August 2021										1	0.75	1.75	\$780.00	\$1,365.00	\$780.00	\$1,365.00
September 2021										3.5		3.5	\$780.00	\$2,730.00	\$780.00	\$2,730.00
Wax, David - Associate												660.5		\$238,016.25		\$274,107.50
January 2019	4	108.25										112.25	\$360.00	\$40,410.00	\$415.00	\$46,583.75
February 2019		132.25										132.25	\$360.00	\$47,610.00	\$415.00	\$54,883.75
March 2019		103										103	\$360.00	\$37,080.00	\$415.00	\$42,745.00
April 2019		130.25									0.5	130.75	\$360.00	\$47,070.00	\$415.00	\$54,261.25
May 2019		39.5										39.5	\$360.00	\$14,220.00	\$415.00	\$16,392.50
June 2019		72	2									74	\$360.00	\$26,640.00	\$415.00	\$30,710.00
July 2019		57.5										57.5	\$360.00	\$20,700.00	\$415.00	\$23,862.50
August 2019		4.5										4.5	\$360.00	\$1,620.00	\$415.00	\$1,867.50
January 2020			6.25									6.25	\$395.00	\$2,468.75	\$415.00	\$2,593.75
June 2020		0.5										0.5	\$395.00	\$197.50	\$415.00	\$207.50

EXHIBIT 4

*In re Twitter Inc. Securities Litigation* , No. 4:16-cv-05314-JST (SK)

**Bleichmar Fonti & Auld LLP**  
**Category Lodestar Chart by Timekeeper and Month**  
**November 14, 2016 - September 20, 2021**

**Category Codes:**

1. Factual Investigation

2. Discovery (Fact & Expert)

3. Briefs, Pretrial Motions & Legal Research

4. Court Appearances

5. Initial or Amended Complaint

6. Client / Shareholder Communications
7. Litigation Strategy & Analysis

8. Settlement Negotiations, Stipulation, Plan of Allocation

9. Appeal

10. Trial Preparation

11. Case Management

TIMEKEEPER	1	2	3	4	5	6	7	8	9	10	11	TOTAL SUM OF HOURS	HISTORIC RATE	LODESTAR AT HISTORIC RATE	CURRENT RATE	LODESTAR AT CURRENT RATE
Weaver, Lesley - Partner												186		\$150,631.25		\$195,300.00
November 2016	0.75				6.25		1.75					8.75	\$800.00	\$7,000.00	\$1,050.00	\$9,187.50
December 2016				1.75			6					7.75	\$800.00	\$6,200.00	\$1,050.00	\$8,137.50
January 2017					2.25							2.25	\$800.00	\$1,800.00	\$1,050.00	\$2,362.50
February 2017							1					1	\$800.00	\$800.00	\$1,050.00	\$1,050.00
April 2017							0.5					0.5	\$800.00	\$400.00	\$1,050.00	\$525.00
May 2017			2.75				1					3.75	\$800.00	\$3,000.00	\$1,050.00	\$3,937.50
June 2017			2.5				0.5					3	\$800.00	\$2,400.00	\$1,050.00	\$3,150.00
July 2017			0.75				0.5				1.5	2.75	\$800.00	\$2,200.00	\$1,050.00	\$2,887.50
August 2017					0.75							0.75	\$800.00	\$600.00	\$1,050.00	\$787.50
September 2017											1	1	\$800.00	\$800.00	\$1,050.00	\$1,050.00
October 2017		2.25	2.25				3.75					8.25	\$800.00	\$6,600.00	\$1,050.00	\$8,662.50
November 2017	0.75	8					0.5					9.25	\$800.00	\$7,400.00	\$1,050.00	\$9,712.50
December 2017		9.25	0.75		4.25						0.5	14.75	\$800.00	\$11,800.00	\$1,050.00	\$15,487.50
January 2018	4.5	18					4.5	0.75			2.5	30.25	\$800.00	\$24,200.00	\$1,050.00	\$31,762.50
February 2018		4	1.5		0.5		2.5					8.5	\$800.00	\$6,800.00	\$1,050.00	\$8,925.00
March 2018		1.5										1.5	\$800.00	\$1,200.00	\$1,050.00	\$1,575.00
April 2018			3.25		0.5							3.75	\$800.00	\$3,000.00	\$1,050.00	\$3,937.50
May 2018		1	2	1							4.5	8.5	\$800.00	\$6,800.00	\$1,050.00	\$8,925.00
June 2018		1										1	\$800.00	\$800.00	\$1,050.00	\$1,050.00
July 2018		3		3				1			2.5	9.5	\$800.00	\$7,600.00	\$1,050.00	\$9,975.00
August 2018		3	1.25					3.25				7.5	\$800.00	\$6,000.00	\$1,050.00	\$7,875.00
September 2018		4.75			1.25			7.75			1.5	15.25	\$800.00	\$12,200.00	\$1,050.00	\$16,012.50
October 2018					0.75		0.5				0.75	2	\$800.00	\$1,600.00	\$1,050.00	\$2,100.00
November 2018		0.25										0.25	\$800.00	\$200.00	\$1,050.00	\$262.50
December 2018		2.25	0.25	0.5	1.5							4.5	\$800.00	\$3,600.00	\$1,050.00	\$4,725.00
January 2019		3.75										3.75	\$840.00	\$3,150.00	\$1,050.00	\$3,937.50
February 2019		2.25									1	3.25	\$840.00	\$2,730.00	\$1,050.00	\$3,412.50
March 2019				1.25	0.5							1.75	\$840.00	\$1,470.00	\$1,050.00	\$1,837.50
May 2019		1										1	\$840.00	\$840.00	\$1,050.00	\$1,050.00
July 2019		2.25										2.25	\$840.00	\$1,890.00	\$1,050.00	\$2,362.50
August 2019			1.5									1.5	\$840.00	\$1,260.00	\$1,050.00	\$1,575.00

EXHIBIT 4

*In re Twitter Inc. Securities Litigation* , No. 4:16-cv-05314-JST (SK)

**Bleichmar Fonti & Auld LLP**  
**Category Lodestar Chart by Timekeeper and Month**  
**November 14, 2016 - September 20, 2021**

**Category Codes:**

1. Factual Investigation

2. Discovery (Fact & Expert)

3. Briefs, Pretrial Motions & Legal Research

4. Court Appearances

5. Initial or Amended Complaint

6. Client / Shareholder Communications
7. Litigation Strategy & Analysis

8. Settlement Negotiations, Stipulation, Plan of Allocation

9. Appeal

10. Trial Preparation

11. Case Management

TIMEKEEPER	1	2	3	4	5	6	7	8	9	10	11	TOTAL SUM OF HOURS	HISTORIC RATE	LODESTAR AT HISTORIC RATE	CURRENT RATE	LODESTAR AT CURRENT RATE
September 2019			1								0.25	1.25	\$840.00	\$1,050.00	\$1,050.00	\$1,312.50
January 2020										3.75		3.75	\$840.00	\$3,150.00	\$1,050.00	\$3,937.50
February 2020					2					2.75		4.75	\$840.00	\$3,990.00	\$1,050.00	\$4,987.50
May 2020					1.25							1.25	\$840.00	\$1,050.00	\$1,050.00	\$1,312.50
July 2021							0.75					0.75	\$885.00	\$663.75	\$1,050.00	\$787.50
August 2021										0.5		0.5	\$975.00	\$487.50	\$1,050.00	\$525.00
September 2021										4		4	\$975.00	\$3,900.00	\$1,050.00	\$4,200.00
<b>Weiler, Matthew - Associate</b>												<b>153.75</b>		<b>\$96,468.75</b>		<b>\$100,706.25</b>
October 2017		16.25	2.75	4.75			2.25				5.5	31.5	\$625.00	\$19,687.50	\$655.00	\$20,632.50
November 2017		2.25										2.25	\$625.00	\$1,406.25	\$655.00	\$1,473.75
December 2017		25.75	0.5		2.75		1.25					30.25	\$625.00	\$18,906.25	\$655.00	\$19,813.75
January 2018		12		3.25	0.75		2				0.25	18.25	\$625.00	\$11,406.25	\$655.00	\$11,953.75
February 2018		0.75	0.5		1.5						1.25	4	\$625.00	\$2,500.00	\$655.00	\$2,620.00
March 2018		3.25		3	18.75		0.5				1	26.5	\$625.00	\$16,562.50	\$655.00	\$17,357.50
April 2018		1.25	5.75				3.25					10.25	\$625.00	\$6,406.25	\$655.00	\$6,713.75
May 2018		3.25	2		0.5						0.25	6	\$625.00	\$3,750.00	\$655.00	\$3,930.00
June 2018							1.25					1.25	\$625.00	\$781.25	\$655.00	\$818.75
July 2018		0.5	0.25	0.25	0.25							1.25	\$625.00	\$781.25	\$655.00	\$818.75
September 2018			1.75					3.5				5.25	\$625.00	\$3,281.25	\$655.00	\$3,438.75
October 2018			1.25									1.25	\$625.00	\$781.25	\$655.00	\$818.75
November 2018		1										1	\$625.00	\$625.00	\$655.00	\$655.00
December 2018					2.25							2.25	\$625.00	\$1,406.25	\$655.00	\$1,473.75
January 2019		2			3.5							5.5	\$655.00	\$3,602.50	\$655.00	\$3,602.50
February 2019					5.5							5.5	\$655.00	\$3,602.50	\$655.00	\$3,602.50
April 2019		1.5										1.5	\$655.00	\$982.50	\$655.00	\$982.50
<b>GRAND TOTAL</b>	<b>46</b>	<b>1840</b>	<b>238.75</b>	<b>46</b>	<b>146.75</b>	<b>0</b>	<b>49.75</b>	<b>39.75</b>	<b>0</b>	<b>15.5</b>	<b>69.25</b>	<b>2491.75</b>		<b>\$1,260,103.75</b>		<b>\$1,384,765.00</b>
<b>LODESTAR AT HISTORIC RATE</b>	\$26,120.00	\$830,220.00	\$142,971.25	\$36,471.25	\$105,777.50		\$35,501.25	\$26,080.00		\$13,357.50	\$43,605.00			<b>\$1,260,103.75</b>		
<b>LODESTAR AT CURRENT RATE</b>	\$30,660.00	\$902,812.50	\$153,491.25	\$41,450.00	\$118,638.75	\$0.00	\$42,645.00	\$30,540.00	\$0.00	\$15,060.00	\$49,467.50					<b>\$1,384,765.00</b>

# **Exhibit 5**

EXHIBIT 5

*In re Twitter Inc. Securities Litigation* , No. 4:16-cv-05314-JST (SK)

**Bleichmar Fonti & Auld LLP**  
**Category Lodestar Chart by Month**  
**November 14, 2016 - September 20, 2021**

**Category Codes:**

1. Factual Investigation

2. Discovery (Fact & Expert)

3. Briefs, Pretrial Motions & Legal Research

4. Court Appearances

5. Initial or Amended Complaint

6. Client / Shareholder Communications
7. Litigation Strategy & Analysis

8. Settlement Negotiations, Stipulation, Plan of Allocation

9. Appeal

10. Trial Preparation

11. Case Management

MONTH	1	2	3	4	5	6	7	8	9	10	11	TOTAL SUM OF HOURS	LODESTAR AT HISTORIC RATE	LODESTAR AT CURRENT RATE
November 2016	21		3.5		12.5		2.5					39.5	\$25,331.25	\$29,591.25
December 2016	13.25			21	13.5		6.75				0.25	54.75	\$41,192.50	\$48,192.50
January 2017	0.25				16.75						1.25	18.25	\$15,423.75	\$17,595.00
February 2017	0.75				26		1				0.75	28.5	\$24,358.75	\$27,402.50
March 2017	1.5				7.75		0.5				4	13.75	\$9,857.50	\$10,618.75
April 2017							0.5				2.5	3	\$1,737.50	\$1,862.50
May 2017			79.25		1.5		1				0.25	82	\$52,552.50	\$55,813.75
June 2017			22.25		6.5		0.5					29.25	\$21,497.50	\$23,306.25
July 2017			1.25		0.5		0.5				1.5	3.75	\$2,710.00	\$3,457.50
August 2017		0.5	1		0.75							2.25	\$1,440.00	\$1,725.00
September 2017											1	1	\$800.00	\$1,050.00
October 2017		26.5	5.75	11.75			8				9.25	61.25	\$44,567.50	\$49,752.50
November 2017	0.75	26.5	1.5				2.5				0.75	32	\$23,820.00	\$27,647.50
December 2017		46	1.25		9.5		1.75				3.5	62	\$40,056.25	\$45,328.75
January 2018	4.5	61		3.25	5.25		6.5	0.75			11.25	92.5	\$56,243.75	\$65,047.50
February 2018		15.5	6.5		6		2.5				1.25	31.75	\$19,252.50	\$22,262.50
March 2018		13.5		3	18.75		0.5				4.5	40.25	\$24,337.50	\$26,185.00
April 2018		1.25	14		0.5		3.25				2.25	21.25	\$14,041.25	\$15,802.50
May 2018		39.25	7.25	1	0.5						5.5	53.5	\$29,525.00	\$33,075.00
June 2018		143.75					1.25				0.75	145.75	\$66,371.25	\$70,286.25
July 2018		153.5	2.5	3.25	0.25			1			4.5	165	\$78,213.75	\$84,738.75
August 2018		105.5	1.25				6.75	13.25			1	127.75	\$62,155.00	\$67,416.25



EXHIBIT 5

*In re Twitter Inc. Securities Litigation* , No. 4:16-cv-05314-JST (SK)

**Bleichmar Fonti & Auld LLP**  
**Category Lodestar Chart by Month**  
**November 14, 2016 - September 20, 2021**

**Category Codes:**

- |  |   |
|--|---|
| 1. Factual Investigation                     | 7. Litigation Strategy & Analysis                           |
| 2. Discovery (Fact & Expert)                 | 8. Settlement Negotiations, Stipulation, Plan of Allocation |
| 3. Briefs, Pretrial Motions & Legal Research | 9. Appeal   |
| 4. Court Appearances                         | 10. Trial Preparation                                       |
| 5. Initial or Amended Complaint              | 11. Case Management   |
| 6. Client / Shareholder Communications       |   |

MONTH	1	2	3	4	5	6	7	8	9	10	11	TOTAL SUM OF HOURS	LODESTAR AT HISTORIC RATE	LODESTAR AT CURRENT RATE
September 2018		68.75	1.75		1.25			24.75			1.5	98	\$51,781.25	\$57,986.25
October 2018		23.75	1.25		0.75		2				1.5	29.25	\$14,081.25	\$15,268.75
November 2018		13.25					0.25					13.5	\$6,337.50	\$6,736.25
December 2018		23.5	0.75	1.5	3.75						0.5	30	\$15,353.75	\$17,295.00
January 2019	4	219.25			3.75							227	\$97,381.25	\$104,447.50
February 2019		254			5.75						2	261.75	\$112,037.50	\$120,301.25
March 2019		148.25		1.25	0.5							150	\$60,043.75	\$66,076.25
April 2019		180					0.25				1	181.25	\$72,373.75	\$79,711.25
May 2019		61.75										61.75	\$25,153.75	\$27,536.25
June 2019		105.75	2									107.75	\$42,671.25	\$46,741.25
July 2019		72										72	\$28,408.75	\$32,043.75
August 2019		9	1.5				0.25				5.75	16.5	\$7,867.50	\$8,430.00
September 2019			37.5		1.25						0.25	39	\$18,825.00	\$19,087.50
October 2019		27.5	40.5									68	\$32,300.00	\$32,300.00
November 2019												0	\$0.00	\$0.00
December 2019												0	\$0.00	\$0.00
January 2020			6.25							3.75		10	\$5,618.75	\$6,531.25
February 2020					2					2.75		4.75	\$3,990.00	\$4,987.50
March 2020												0	\$0.00	\$0.00
April 2020												0	\$0.00	\$0.00
May 2020					1.25							1.25	\$1,050.00	\$1,312.50
June 2020		0.5										0.5	\$197.50	\$207.50

EXHIBIT 5

*In re Twitter Inc. Securities Litigation* , No. 4:16-cv-05314-JST (SK)

Bleichmar Fonti & Auld LLP  
Category Lodestar Chart by Month  
November 14, 2016 - September 20, 2021

Category Codes:

1. Factual Investigation

2. Discovery (Fact & Expert)

3. Briefs, Pretrial Motions & Legal Research

4. Court Appearances

5. Initial or Amended Complaint

6. Client / Shareholder Communications
7. Litigation Strategy & Analysis

8. Settlement Negotiations, Stipulation, Plan of Allocation

9. Appeal

10. Trial Preparation

11. Case Management

MONTH	1	2	3	4	5	6	7	8	9	10	11	TOTAL SUM OF HOURS	LODESTAR AT HISTORIC RATE	LODESTAR AT CURRENT RATE
July 2020												0	\$0.00	\$0.00
August 2020												0	\$0.00	\$0.00
September 2020												0	\$0.00	\$0.00
October 2020												0	\$0.00	\$0.00
November 2020												0	\$0.00	\$0.00
December 2020												0	\$0.00	\$0.00
January 2021												0	\$0.00	\$0.00
February 2021												0	\$0.00	\$0.00
March 2021												0	\$0.00	\$0.00
April 2021												0	\$0.00	\$0.00
May 2021												0	\$0.00	\$0.00
June 2021												0	\$0.00	\$0.00
July 2021							0.75					0.75	\$663.75	\$787.50
August 2021										1.5	0.75	2.25	\$1,852.50	\$1,890.00
September 2021										7.5		7.5	\$6,630.00	\$6,930.00
GRAND TOTAL	46	1840	238.75	46	146.75	0	49.75	39.75	0	15.5	69.25	2491.75	\$1,260,103.75	\$1,384,765.00

# **Exhibit 6**

EXHIBIT 6

*In re Twitter Inc. Securities Litigation* , No. 4:16-cv-05314-JST (SK)

Bleichmar Fonti & Auld LLP  
Category Lodestar Chart by Timekeeper  
November 14, 2016 - September 20, 2021

Category Codes:

1. Factual Investigation

2. Discovery (Fact & Expert)

3. Briefs, Pretrial Motions & Legal Research

4. Court Appearances

5. Initial or Amended Complaint

6. Client / Shareholder Communications
7. Litigation Strategy & Analysis

8. Settlement Negotiations, Stipulation, Plan of Allocation

9. Appeal

10. Trial Preparation

11. Case Management

TIMEKEEPER	1	2	3	4	5	6	7	8	9	10	11	TOTAL SUM OF HOURS	LODESTAR AT HISTORIC RATE	LODESTAR AT CURRENT RATE
Aldridge, Emily - Associate		12.5	3.75								3.5	19.75	\$11,352.50	\$12,343.75
Cibulka, Britt - Associate		15.5									9	24.5	\$11,515.00	\$11,515.00
Dennany, Nicholas - Associate	17		0.5		4.25						0.25	22	\$10,392.50	\$13,310.00
Desai, Mili - Associate	11.5		4.5		6.5							22.5	\$12,037.50	\$12,037.50
English, Robyn - Associate	2.5		50.75		3						5.25	61.5	\$32,902.50	\$32,902.50
Fonti, Joseph - Partner	5	30.25	30	26.25	53.25		6.5	7.25			9	167.5	\$147,445.00	\$164,987.50
McMenomy, Jennifer - Associate		12.5	1.5		11						0.5	25.5	\$9,945.00	\$9,945.00
Meeks, Wilson - Partner			19		6.5							25.5	\$18,870.00	\$19,762.50
Moody, Janelle - Associate		974.25	80.25				8.5	16.25			12.75	1092	\$503,593.75	\$518,700.00
Robertson, Kelsey - Paralegal		6.75		1	1.75						1.75	11.25	\$3,622.50	\$3,937.50
Simnowitz, Sara - Special Counsel		3.25	5.75		3		0.5			4.5	2.5	19.5	\$13,311.25	\$15,210.00
Wax, David - Associate	4	647.75	8.25								0.5	660.5	\$238,016.25	\$274,107.50
Weaver, Lesley - Partner	6	67.5	19.75	7.5	21.75		23.75	12.75		11	16	186	\$150,631.25	\$195,300.00
Weiler, Matthew - Associate		69.75	14.75	11.25	35.75		10.5	3.5			8.25	153.75	\$96,468.75	\$100,706.25
GRAND TOTAL	46	1840	238.75	46	146.75	0	49.75	39.75	0	15.5	69.25	2491.75	\$1,260,103.75	\$1,384,765.00

# **Exhibit 7**

**Exhibit 7**

***In re Twitter Inc. Securities Litigation, No. 4:16-cv-05314-JST (SK)***

**Bleichmar Fonti & Auld LLP**

**Summary of Expenses**

**November 14, 2016 – September 20, 2021**

<b>CATEGORY</b>	<b>AMOUNT</b>
Court Reporter Costs and Service & Filing Fees	\$1,316.45
Travel, Food and Lodging	\$4,044.27
Postage & Express Mail	\$157.93
Computer Research	\$1,537.97
Photocopying & Printing	\$230
<b>Total:</b>	<b>\$7,286.62</b>

# **Exhibit 8**

## EXHIBIT 8

*In re Twitter Inc. Securities Litigation*, No. 4:16-cv-05314-JST (SK)

**Bleichmar Fonti & Auld LLP**  
**Detailed List of Expenses Organized by Categories**

Date Paid	Description	Total	Category
11/18/2016	Transcript Fee - Tracy McGurk	\$ 83.70	Court Reporter Costs and Service & Filing Fees
12/20/2016	Filing Fee - US District Court	\$ 310.00	Court Reporter Costs and Service & Filing Fees
8/25/2017	Service Fee - Wheels of Justice	\$ 150.00	Court Reporter Costs and Service & Filing Fees
10/10/2017	Transcript Fee - Pamela Batalo, CSR, Inc.	\$ 253.00	Court Reporter Costs and Service & Filing Fees
2/6/2018	Service Fee - Wheels of Justice - Clerk H.L. Almacen	\$ 148.00	Court Reporter Costs and Service & Filing Fees
2/22/2018	Service Fee - Wheels of Justice - Serving Judge Tigar with Paperwork	\$ 164.25	Court Reporter Costs and Service & Filing Fees
7/23/2018	Transcript Fee - Belle Ball - July 12, 2018 Hearing	\$ 172.50	Court Reporter Costs and Service & Filing Fees
1/9/2019	Lesley Weaver Hearing Call Charge	\$ 35.00	Court Reporter Costs and Service & Filing Fees
12/22/2016	Joe Fonti travel to San Francisco for Lead Plaintiff Hearing held on 12/22/16. (Uber \$35.63; car Service \$143.95; car Service \$161.50; dinner \$55; hotel \$400; airfare \$991.20)	\$ 1,787.28	Travel, Food and Lodging
12/22/2016	Lesley Weaver Attendance at Lead Plaintiff Hearing held on 12/22/16. (parking \$18.00; parking for dinner meeting \$27.00)	\$ 45.00	Travel, Food and Lodging
11/5/2017	Joe Fonti travel to San Francisco for Motion to Dismiss Hearing held on 11/5/2017 (hotel \$400; dinner \$37.47; taxi \$27.50; taxi \$32.50; airfare \$579.50; taxi \$15; taxi \$45)	\$ 1,136.97	Travel, Food and Lodging
11/5/2017	Matt Weiler attendance at Motion to dismiss hearing held on 11/5/2017 (Lyft \$27.07; Lyft \$7.01)	\$ 34.08	Travel, Food and Lodging
5/2/2018	Lesley Weaver Dinner with co-counsel Meghan Oliver from Motley Rice (dinner \$110)	\$ 110.00	Travel, Food and Lodging
5/23/2018	Lesley Weaver attendance at CMC Meeting (parking \$20)	\$ 20.00	Travel, Food and Lodging
7/12/2018	Lesley Weaver attendance at Class Certification Hearing held on 07/12/2018 (breakfast \$8.97; parking \$20)	\$ 28.97	Travel, Food and Lodging
10/17/2018	Lesley Weaver attendance at Mediation held on 09/26/18 (airfare \$593.96; lunch \$30; airfare \$207.20; Uber \$39.38)	\$ 870.54	Travel, Food and Lodging
3/11/2019	Lesley Weaver attendance at Discovery Hearing held on 7/11/2018 (Uber \$6.39; Uber \$5.04)	\$ 11.43	Travel, Food and Lodging
11/21/2016	Fedex - US District Court Ohio - Tracy McGurk	\$ 27.52	Postage & Express Mail
10/16/2017	Fedex	\$ 25.93	Postage & Express Mail
12/11/2017	Fedex	\$ 17.50	Postage & Express Mail
12/14/2017	Reimbursement to Matt Weiler for Courier to serve document requests	\$ 17.38	Postage & Express Mail
12/18/2017	Fedex	\$ 11.55	Postage & Express Mail
12/18/2017	Fedex	\$ 17.02	Postage & Express Mail
7/30/2018	Fedex	\$ 26.72	Postage & Express Mail
8/27/2018	Fedex	\$ 14.31	Postage & Express Mail
05/30/2017	May 2017 Westlaw Charges	\$ 372.20	Computer Research
06/30/2017	June 2017 Westlaw Charges	\$ 39.51	Computer Research
10/30/2017	October 2017 Westlaw Charges	\$ 26.89	Computer Research
11/30/2017	November 2017 Westlaw	\$ 8.14	Computer Research
03/02/2018	Feb 2018 Westlaw Charges	\$ 70.20	Computer Research
03/30/2018	March 2018 Westlaw Charges	\$ 15.48	Computer Research
04/30/2018	April 2018 Westlaw Charges	\$ 19.05	Computer Research
05/31/2018	May 2018 Westlaw Charges	\$ 2.36	Computer Research
07/02/2018	June 2018 Westlaw Charges	\$ 53.73	Computer Research
07/30/2018	July 2018 Westlaw Charges	\$ 5.11	Computer Research
08/07/2018	4/1/2018 to 6/30/2018 Pacer Charges	\$ 35.80	Computer Research
08/30/2018	August 2018 Westlaw Charges	\$ 13.97	Computer Research
10/01/2018	September 2018 Westlaw Charges	\$ 123.52	Computer Research
10/30/2018	October 2018 Westlaw Charges	\$ 1.94	Computer Research
11/30/2018	November 2018 Westlaw Charges	\$ 2.00	Computer Research
12/31/2018	Westlaw Reserch Services December 2018	\$ 5.04	Computer Research
01/30/2019	January 2019 Westlaw Research	\$ 7.07	Computer Research
02/06/2019	Pacer Q4 2018	\$ 4.00	Computer Research
03/04/2019	February 2019 Westlaw	\$ 4.67	Computer Research
04/01/2019	March 2019 Westlaw	\$ 1.09	Computer Research
04/30/2019	April 2019 Westlaw	\$ 12.90	Computer Research
05/07/2019	Q1 Pacer Reserch Charges Doc ID: 4852-8020-7512	\$ 2.10	Computer Research
05/30/2019	May 2019 Westlaw Reserch	\$ 5.38	Computer Research
07/01/2019	June 2019 Westlaw charges	\$ 3.03	Computer Research
07/30/2019	July 2019 Westlaw	\$ 2.13	Computer Research
09/03/2019	August 2019 Westlaw	\$ 5.68	Computer Research
09/30/2019	September 2019 Westlaw	\$ 9.23	Computer Research
10/30/2019	October 2019 Westlaw Charges	\$ 7.51	Computer Research
12/02/2019	November 2019 Westlaw	\$ 9.79	Computer Research
12/30/2019	December 2019 Westlaw Fee	\$ 5.85	Computer Research
01/30/2020	January 2020 Westlaw	\$ 5.14	Computer Research
03/03/2020	February 2020 Westlaw Charges	\$ 5.90	Computer Research
03/30/2020	March 2020 Westlaw Charges	\$ 3.75	Computer Research
04/30/2020	April 2020 Westlaw Research Charges	\$ 7.27	Computer Research
05/06/2020	Q1 2020 Pacer Charges	\$ 9.60	Computer Research
06/01/2020	May 2020 Westlaw Research	\$ 8.12	Computer Research
07/01/2020	June 2020 Westlaw Charges	\$ 11.41	Computer Research
07/27/2020	July 2020 Westlaw Charges	\$ 4.03	Computer Research



Date Paid	Description	Total	Category
08/05/2020	Q2 2020 Research Charges	\$ 3.00	Computer Research
08/26/2020	August 2020 Westlaw Research	\$ 4.91	Computer Research
09/28/2020	September 2020 Research Services	\$ 2.55	Computer Research
10/26/2020	October 2020 Westlaw Charge	\$ 1.83	Computer Research
11/05/2020	Q3 2020 Pacer Research Charges	\$ 8.10	Computer Research
11/30/2020	November 2020 Westlaw Research Charges	\$ 2.06	Computer Research
12/28/2020	December 2020 Westlaw Research Charges	\$ 2.96	Computer Research
01/26/2021	January 2021 Westlaw Research Charges	\$ 3.24	Computer Research
02/10/2021	Q4 2020 Pacer Research	\$ 6.00	Computer Research
02/26/2021	Feb 2021 Westlaw Research Charge	\$ 528.46	Computer Research
03/26/2021	March 2021 Westlaw Research Charge	\$ 5.46	Computer Research
04/26/2021	March 2021 Westlaw Charge	\$ 4.87	Computer Research
05/26/2021	May 2021 Westlaw Research Charge	\$ 6.60	Computer Research
06/28/2021	June 2021 Westlaw Research Charge	\$ 6.54	Computer Research
07/26/2021	July 2021 Westlaw Research Charge	\$ 9.53	Computer Research
08/26/2021	Aug 2021 Westlaw Research Charge	\$ 11.27	Computer Research
9/13/2018	Wheels of Justice - Courtesy Copies Delivery	\$ 50.00	Photocopying & Printing
1/11/2019	Wheels of Justice - Courtesy Copies Delivery	\$ 55.00	Photocopying & Printing
1/29/2019	Wheels of Justice - Courtesy Copies Delivery	\$ 50.00	Photocopying & Printing
3/1/2019	Wheels of Justice - Courtesy Copies Delivery	\$ 75.00	Photocopying & Printing
	<b>Total</b>	\$ 7,286.62	

# **Exhibit 9**

**Arrow Transportation**  
**11-17 43rd Avenue**  
**Long Island City, NY 11101**  
**Phone: 212-431-1900 Fax: 718-392-3989**  
**Email: reservations@arrow-trans.com;dispatch@arrow-trans.com**  
**Web: www.arrow-trans.com**

## Ride Receipt

Bleichmar Fonti Auld Law  
 7 TIMES SQ  
 27TH FL  
 NEW YORK, NY 11

Account# : 742  
 Invoice# : CCB121216  
 Inv Date : 12/12/16

Date	Description	Charges	Credits
12/08/16	<b>Res#:</b> 391936 <b>PU:</b> LGA 802 DL <b>Drop:</b> LARCHMONT NY 10538 <b>Pickup:</b> 05:35PM <b>Dropoff:</b> 06:34PM <b>Passenger:</b> Fonti, Joseph  Flat: SEDAN \$110.00 Req By: Javier Blichmar Chauff: 0162 Wait Time: - Wait Chg: Phone: - Mins Phone: Stops: Stops: \$0.00  Voucher# : E391936 Client-Matter Number aaaaa FUEL \$5.50 Tolls: \$9.75 Acct Svc: \$4.00		
	Tax: \$14.70 Gratuity: \$0.00 Discount: Deposit:  Ride Total: \$143.95 <b>Paid By Credit Card VI</b> <b>xxxxxxxxxxxx2862</b> <b>Trip Amount Due:</b> \$0.00		

For the fastest way to get ride receipts, please go to [www.arrow-trans.com](http://www.arrow-trans.com) | NYC Taxi & Limousine  
 Commission Base License # B01309

*TWITTER HEARING*

CALIFORNIA PARKING  
530 TURK STREET

CPC Receipt  
12:00

THIS IS YOUR RECEIPT  
Meter: 03010760-3010760  
Trans: 016746  
Time: 2:30PM  
Date: DEC 22 2016  
Price:\$18.00  
Card: \*\*\*\*\*1039  
Auth: 529907

PERMIT EXPIRES:  
**2:30AM FRI  
DEC 23 2016**

THIS SIDE UP - ON DASH

THIS SIDE UP - ON DASH

*TWITTER HEARING*

Portsmouth Square Garage  
733 Kearny Street - San Francisco, CA 94108  
Phone: 415-982-6353 - Fax: 415-986-7567  
Business Lic. No.: 126283

TR 467846 Tkt# 4648133 Op 3 augustus.m  
Entrance: 2016-12-21 20:05 MN 1  
Exit : 2016-12-22 11:33 MN 6  
Length of stay: 0 d 15 h 27 mn

Regular Rate	\$	27.00
-----		
Total	\$	27.00
Credit Card	\$	27.00
CC American Express		xxx1039
Ref#		1237887
Auth#		520045

Signature: -----

Customer Copy

Thank You. Come again.  
Drive safely!

This receipt does not grant exit privileges.  
Lost ticket pays maximum rate per day.

**Arrow Transportation**  
**11-17 43rd Avenue**  
**Long Island City, NY 11101**  
**Phone: 212-431-1900 Fax: 718-392-3989**  
**Email: reservations@arrow-trans.com;dispatch@arrow-trans.com**  
**Web: www.arrow-trans.com**

## Ride Receipt

Bleichmar Fonti Auld Law  
 7 TIMES SQ  
 27TH FL  
 NEW YORK, NY 11

Account# : 742  
 Invoice# : CCB122716  
 Inv Date : 12/26/16

Date	Description	Charges	Credits
12/21/16	<b>Res#:</b> 392156 <b>PU:</b> 10 Oxford Road LARCHMONT NY 10538 <b>Drop:</b> JFK <b>Pickup:</b> 06:00AM <b>Dropoff:</b> 08:04AM <b>Passenger:</b> Fonti, Joseph		
	Flat: SEDAN	\$125.00	
	Req By: Michael Russo Chauff: 2082		
	Wait Time: - Wait Chg:		
	Phone: - Mins Phone:		
Stops		Stops: \$0.00	
	Voucher# : E392156		
	Client-Matter Number 1013.001	FUEL \$6.25	
		Tolls: \$9.75	
		Acct Svc: \$4.00	
		Tax: \$16.50	
		Gratuity: \$0.00	
		Discount:	
		Deposit:	
		<hr/>	
	Ride Total:	\$161.50	
	<b>Paid By Credit Card VI</b>		
	<b>xxxxxxxxxxxx2862</b>	<b>Trip Amount Due:</b>	<b>\$0.00</b>

For the fastest way to get ride receipts, please go to [www.arrow-trans.com](http://www.arrow-trans.com) | NYC Taxi & Limousine  
 Commission Base License # B01309

**Transaction Details Platinum Delta SkyMiles® / November 22, 2016 to December 14, 2016****Prepared for**

Joseph Fonti

**Account Number**

[REDACTED]

Date	Description	Amount	Extended Details	Description	Client Matter
[REDACTED]					
12/07/2016	CANYON CREEK TRAVEL - RICHARDSON, TX	35.00	121509 TRAVEL AGENCY TRAVEL AGENCY SERVICE From: To: Carrier: Class: N/A N/A YY N/A N/A N/A Ticket Number: 89006982318774 Passenger Name: FONTI/JOSEPH A Document Type: TRAVEL AGENCY FEE	Twitter: Travel to Lead Plaintiff hearing	1013.001
12/07/2016	CANYON CREEK TRAVEL - RICHARDSON, TX	956.20	121509 AIRLINE/AIR CARRIER DELTA AIR LINES INC. From: To: Carrier: Class: N.Y. J F KENNEDY I SAN FRANCISCO INTL DL M N.Y. J F KENNEDY I DL H N/A N/A Ticket Number: 00679287897245 Date of Departure: 12/21 Passenger Name: FONTI/JOSEPH A Document Type: PASSENGER TICKET	Twitter: Travel to Lead Plaintiff hearing	1013.001

					Amount
12/22/16	QUINCE RESTAURANT		SAN FRANCISCO	CA	
	RESTAURANT				
	FOOD/BEVERAGE	\$89.07			<b>\$55.00 Allowed</b>
12/22/16	RITZ-CARLTON		SAN FRANCISCO	CA	
	Arrival Date	Departure Date			
	12/21/16	12/22/16			<b>\$400.00 Allowed</b>
	00000000				
12/23/16	UBER *US DEC22 LUL3		HELP.UBER.COM	CA	\$35.63
	HELP.UBER.COM				

Continued on reverse



**Canyon Creek Travel**  
**Agency Address: Bill Wert / Mike Watts**  
**Phone: 972-792-3657 Bill / 972-643-4917 Mike**  
**BWERT@CCTRVL.COM**

## Electronic Invoice

**Prepared For:**  
**FONTI/JOSEPH A**

Ref: **U1-MULTI CM**

SALES PERSON	72
INVOICE NUMBER	1403673
INVOICE ISSUE DATE	26 Sep 2017
RECORD LOCATOR	AZQUQP
CUSTOMER NUMBER	0010001150

Client Address  
 BLEICHMAR FONTI AND AULD LLP  
 7 TIMES SQUARE, 27TH FLR  
 NEW YORK NY 10036

### Notes

\*\*\*\*\*

FOR EMERGENCY RESERVATIONS ASSISTANCE AFTER NORMAL  
 BUSINESS HOURS PLEASE CALL 800-843-9550 AND USE  
 CODE - S-N9K2. A 20.00 SERVICE FEE APPLIES FOR  
 NON-EMERGENCY CALLS.

\*\*\*\*\*

### ----- ACCOUNTING -----

BASE COACH UPGRADABLE FARE 1159.10

\*\*\*\*\* TICKETS ARE NONREFUNDABLE. CHANGES ARE SUBJECT TO \*\*\*\*\*

\*\*\*\*\* AVAILABILITY / THE NEXT HIGHEST FARE AND A \*\*\*\*\*

\*\*\*\*\* 200.00 PENALTY. MINIMUM OR MAXIMUM STAY \*\*\*\*\*

\*\*\*\*\* REQUIRMENTS MAY AFFECT ANY CHANGES. \*\*\*\*\*

\*\*\*\*\* PLEASE REVIEW ITINERARY UPON RECIEPT.

**DATE: Tue, Oct 03**

Flight: DELTA AIR LINES INC 6139 Operated by: REPUBLIC AIRLINE-DL CONNECTION-DL SHUTTLE			
From	NEW YORK LGA, NY	Departs	10:00am
To	WASHINGTON REAGAN, DC	Arrives	11:36am
Departure Terminal	A	Arrival Terminal	B
Duration	1hr(s) 36min(s)	Class	Economy
Type	EMBRAER JET	Meal	No Meal Service
Stop(s)	Non Stop		
Seat(s) Details	FONTI/JOSEPH A	Seat(s) - 10C	DL - XXXXXXXX 55

**DATE: Tue, Oct 03**

Hotel: OMNI HOTELS, OMNI SHOREHAM HOTEL			
Service City	WASHINGTON REAGAN		
Check-In	03 Oct	Check-Out	04 Oct
Rooms(s)	1	Room Details	DELUXE ROOM 1 KING BED
Night(s)	1	Rate per Night	
Confirmation Number	40029908678	Approx. Total Price	
CD-	C1000605		INCLUDES TAXES AND SURCHARGES
Service Information		Member ID-	61229456
Guarantee	Guaranteed Late	Phone	



## Arrival

## TAX AND/OR SURCHARGE INFORMATION (USD)

 OCCUPANCY TAX  
 TOTAL TAX   
 TOTAL SURCHARGE 


**DATE: Wed, Oct 04****Flight: DELTA AIR LINES INC 98**

From	WASHINGTON REAGAN, DC	Departs	2:50pm
To	DETROIT METRO, MI	Arrives	4:26pm
Departure Terminal	B	Arrival Terminal	EM
Duration	1hr(s) 36min(s)	Class	Business
Type	AIRBUS INDUSTRIE A319 JET	Meal	No Meal Service
Stop(s)	Non Stop		
Seat(s) Details	FONTI/JOSEPH A	Seat(s) - 01C	DL - XXXXXXXX 55


**DATE: Wed, Oct 04****Flight: DELTA AIR LINES INC 1658**

From	DETROIT METRO, MI	Departs	5:55pm
To	SAN FRANCISCO, CA	Arrives	8:08pm
Departure Terminal	EM	Arrival Terminal	1
Duration	5hr(s) 13min(s)	Class	
Type	BOEING 757 JET	Meal	Dinner
Stop(s)	Non Stop		
Seat(s) Details	FONTI/JOSEPH A	Seat(s) - 04B	DL - XXXXXXXX 55

**DATE: Wed, Oct 04****Hotel: HILTON HOTELS, HILTON SAN FRANCISCO**

Service City	SAN FRANCISCO		
Check-In	04 Oct	Check-Out	06 Oct
Rooms(s)	1		
Night(s)	2	Rate per Night	VARIED**
Confirmation Number	3392423526	Approx. Total Price	
			INCLUDES TAXES AND SURCHARGES EXCLUDES INCIDENTALS
CD-	8181000		
Service Information		Member ID-	795706335
Guarantee	Guaranteed Late Arrival	Phone	

**\*\*RATES AND EFFECTIVE DATES (USD)**

 EFFECTIVE 04OCT - 05OCT  
 EFFECTIVE 05OCT - 06OCT

**\$400.00 Allowed**

## TAX AND/OR SURCHARGE INFORMATION (USD)

TOTAL TAX   
 TOTAL SURCHARGE 

**DATE: Fri, Oct 06****Flight: DELTA AIR LINES INC 470**

From	SAN FRANCISCO, CA	Departs	12:55pm
To	NEW YORK JFK, NY	Arrives	9:35pm
Departure Terminal	1	Arrival Terminal	4
Duration	5hr(s) 40min(s)	Class	Premium Economy
Type	BOEING 767-300 WINGLETS	Meal	Lunch
Stop(s)	Non Stop		
Seat(s) Details	FONTI/JOSEPH A	Seat(s) - 17G	DL - XXXXXXXX 55

**DATE: Fri, Mar 30**

<b>Others</b>
SAN FRANCISCO THANK YOU FOR YOUR BUSINESS

**Ticket Information**

<b>Ticket Number</b>	DL 8655917711	<b>Passenger</b>	FONTI JOSEPH A	
		<b>Billed to:</b>	AX XXXXXXXXXXXX1006	USD
<b>Service Fee</b>	XD 0724579437	<b>Passenger</b>	FONTI JOSEPH A	
		<b>Billed to:</b>	AX XXXXXXXXXXXX1006	USD

**SubTotal**

**Net Credit Card Billing**

**Airfare: \$579.50**

**Total Amount Due**

**ITINERARY NOTES:**  
DELTA AIR LINES CONFIRMATION NUMBER - HHRB76

The carriage of certain hazardous materials, like aerosols, fireworks, and flammable liquids, aboard the aircraft is forbidden. If you do not understand these restrictions, further information may be obtained from your airline.

Your travel arranger provides the information contained in this document. If you have any questions about the content, please contact your travel arranger. For Credit Card Service fees, please see eTicket receipt for total charges.



HILTON SAN FRANCISCO UNION SQUARE

333 O'Farrell Street | San Francisco, CA | 94102

T: 415 771 1400 | F: 415 771 6807

W: hilton.com

10/15/1013  
SPLIT  
HOTEL

## NAME AND ADDRESS:

FONTI, JOSEPH A

\*\*\*\*\*

\*\*\*\*\*

\*\*\*\*\*

Room: 13383/K1E  
Arrival Date: 10/4/2017 8:47:00 PM  
Departure Date: 10/6/2017Adult/Child: 0/0  
Room Rate: 276.36Rate Plan: HPPRP1  
HH #: 795\*\*\*\*\* GOLD  
AL: DL #231\*\*\*\*\*  
Car:**Hilton**

Confirmation Number: \*\*\*\*\*

10/5/2017

DATE	DESCRIPTION	ID	REF. NO	CHARGES	CREDITS	BALANCE
9/26/2017	Advance Deposit AX *1006	CDEGUZMA	23682936			
10/4/2017	GUEST ROOM	RKHEYO	23717871			
10/4/2017	CALIFORNIA TOURISM TAX	RKHEYO	23717871			
10/4/2017	CITY OCCUPANCY TAX	RKHEYO	23717871			
10/4/2017	SF BUSINESS DISTRICT ASSESSMNT	RKHEYO	23717871			
10/5/2017	GUEST ROOM	RKHEYO	23722312			
10/5/2017	CALIFORNIA TOURISM TAX	RKHEYO	23722312			
10/5/2017	CITY OCCUPANCY TAX	RKHEYO	23722312			
10/5/2017	SF BUSINESS DISTRICT ASSESSMNT	RKHEYO	23722312			
	WILL BE SETTLED TO AX*1006					
	EFFECTIVE BALANCE					
				<b>\$400.00 Allowed</b>		\$0.00
						\$0.00

Hilton Honors (BH) stays are posted within 72 hours of checkout. To check your earnings or book your next stay at more than 5,000 hotels and resorts in 100 countries, please visit [Honors.com](http://Honors.com)

Thank you for choosing Hilton. You'll get more when you book directly with us - more destinations, more points, and more value. Book your next stay at [hilton.com](http://hilton.com).

ACCOUNT NO.

CARD MEMBER NAME

ESTABLISHMENT NO. &amp; LOCATION

ESTABLISHMENT AGREES TO TRANSMIT TO CARD HOLDER FOR PAYMENT

CARD MEMBER'S SIGNATURE

MERCHANDISE AND/OR SERVICES PURCHASED ON THIS CARD SHALL NOT BE RESOLD OR RETURNED FOR A CASH REFUND.

DATE OF CHARGE

FOLIO NO./CHECK NO.  
4381776 A

AUTHORIZATION

INITIAL

PURCHASES &amp; SERVICES

TAXES

TIPS &amp; MISC.

TOTAL AMOUNT

PAYMENT DUE UPON RECEIPT



CONRAD



CURIO



TAPESTRY



Dinner JAF

URBAN TAVERN  
Hilton San Francisco Union SQ  
333 O Farrell Street  
CA 94102 USA

Customer Copy

Table # : 55/1  
Server : 2008MICHELLE  
Merchant ID : 001060000802989374  
Card No. : XXXXXXXXXXXX1006  
Check No. : 4357  
EntryMode : ICC  
Card Type : AMEX  
Trans Type : SALE  
Trans Time : 10/04/2017 21:17  
Trace No. : 006797  
Reference # : 407277119497  
Auth Code : 894638

Application Label: AMERICAN EXPR  
TC: 185C397C7B3FC2FF  
TVR: 0000008000  
AID: A000000025010801

Subtotal : USD 31.47

Tip : USD 6

1013.001

### PASSENGER'S RECEIPT, TAXICAB FARE

Date 10-4-17



Amount of Fare \$ \_\_\_\_\_

Other Charges \$ \_\_\_\_\_

Total . . . . \$ 55

Driver's Name \_\_\_\_\_

Cab Number           340           RIKPOLE

1015.001 Hotel

# Lucky Cab 1013.001

120 Willow Street, S.F., CA 94109  
Tel: (415) 682-9988, (415) 681-6688

From: MEETING W/ HEMMING MOORE Cab#: \_\_\_\_\_  
To: SF COURT HOUSE Date: 10/5/17  
Driver: \_\_\_\_\_ Amount: \$15 cash


●●○○ AT&T

1:15 PM

42%

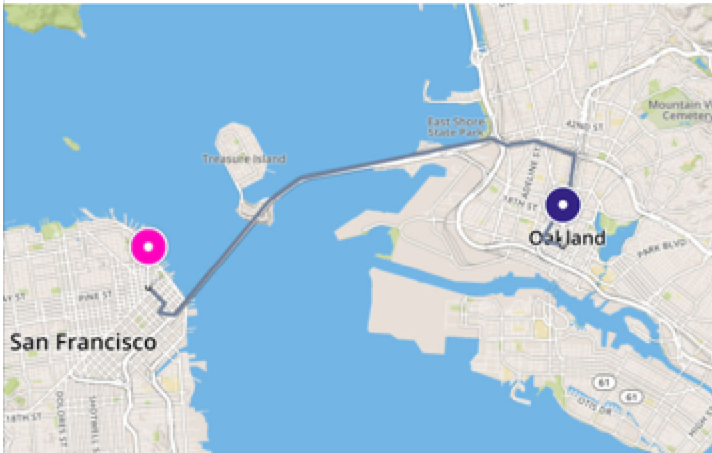
<

Oct 5, 2017 - 11:16 AM



\$27.07

Thanks for riding with Zhi



● Pickup 11:16 AM

1135 Broadway, Oakland

● Dropoff 11:47 AM

135 Front St, San Francisco

Lyft fare (10.72mi, 30m 41s)

\$22.07


●●○○ AT&T

1:15 PM

42%

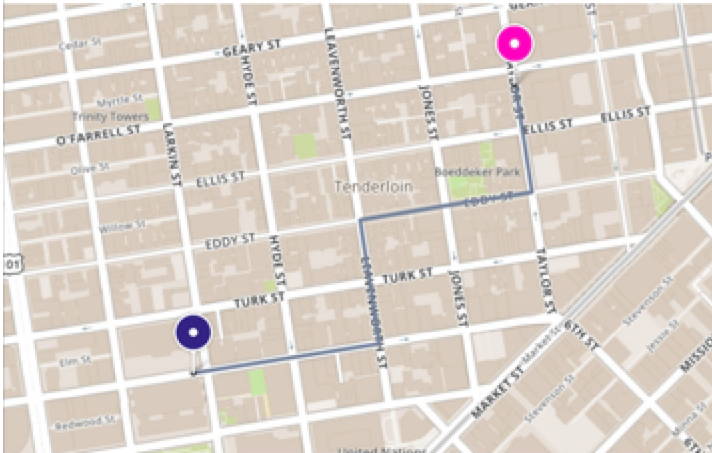
<

Oct 5, 2017 - 3:22 PM



\$7.01

Thanks for riding with Aaron



● Pickup 3:22 PM

440 Golden Gate Ave, San Francisco

● Dropoff 3:29 PM

374 Taylor St, San Francisco

Lyft fare (0.62mi, 6m 46s)

\$7.01



# Reciept

1013.001

Date: 10/6

Pick up Time: Hotel

Dropoff Time: Airport.



EXECUTIVE  
LIMO  
SERVICES

Amount \$ 45-

CASH

RECEIVED Fare includes H.S.T. 65 USD 100 dollars

FROM AIRPORT CASH

TO Client Meeting

**AIRLINE LIMOUSINE**

DATE 10/12/17 AUTHORIZATION

*Thank you for choosing Airline Limousine*

CALIFORNIA PARKING  
530 TURK STREET  
CPC Receipt  
12:00

THIS IS YOUR RECEIPT  
Meter: 03010760-301076  
Trans: 049320  
Time: 2:57PM  
Date: JUL 12 2018  
Price: \$20.00  
Card: \*\*\*\*\*3035  
Auth: 502159

PERMIT EXPIRES:

2:57AM FRI  
JUL 13 2018

**Orenstein, Gregory**

---

**From:** Lesley Weaver <lesley.weaver@gmail.com>  
**Sent:** Monday, June 11, 2018 12:17 PM  
**To:** Orenstein, Gregory; receipts@concur.com  
**Subject:** Fwd: How you enjoyed your Wednesday evening

Please bill to Twitter - dinner with Meghan Oliver

----- Forwarded message -----

From: **Accounts @ The Battery** <[accounts@thebatterysf.com](mailto:accounts@thebatterysf.com)>

Date: Thu, May 3, 2018 at 12:55 AM

Subject: How you enjoyed your Wednesday evening

To: Lesley Weaver <[lesley.weaver@gmail.com](mailto:lesley.weaver@gmail.com)>

RECEIPT 18045985

THE  
**BATTERY**  
—xxx—  
SAN FRANCISCO

THANK YOU!

Lesley

It was a pleasure to see you at The Battery. Here is a receipt for the amount charged to your membership account.

05/02/2018

19:19

Check:	18045985	Table:	31
Server:	Sok Im	Guests:	2
Terminal:	18		

1 Cheese Plate  
2 NY Steak  
1 Little Gem Salad  
1 Hot Rock  
1 Brussels Sprouts



1 TURLEY15KIRSCH

Subtotal  
Tax  
Tip  
Total

**\$110.00**  
**Allowed**

Member Charge  
5290 Weaver, Lesley

GRAND TOTAL

05/02/2018

22:37

Looking forward to seeing you again soon.

The Battery

THE  
**BATTERY**  
—xxx—  
SAN FRANCISCO



CALIFORNIA PARKING  
530 TURK STREET

CPC Receipt  
12:00

THIS IS YOUR RECEIPT  
Meter: 03010760-301076  
Trans: 046241  
Time: 2:11PM  
Date: MAY 23 2018  
Price: \$20.00  
Card: \*\*\*\*\*1039  
Auth: 501732

PERMIT EXPIRES:

2:11AM THU  
MAY 24 2018



**REGENT CATERING PCS**  
450 GOLDEN GATE AVE 2ND  
SAN FRANCISCO, CA 94102  
415-934-0797

**ORDER: 23**

Cashier: RH

12-Jul-2018 10:11:33A

1 Coffee(Reg)

\$0.00

Med \$1.79

3 Bacon

\$2.97

2 Egg(Any Style)

\$1.70

1 Potato\_Hashbrown

\$1.79

**Subtotal**

**\$8.25**

**Tax**

**\$0.72**

**Total**

**\$8.97**

CASH SALE

\$8.97

Cash tendered

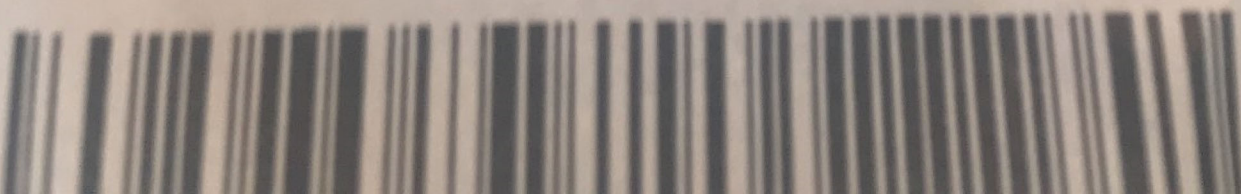
\$20.00

Change

\$11.03

Order EN2T5K6DDRY6W

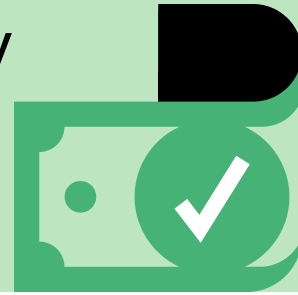
Online: <https://clover.com/p/XT9636A6XR77Y>



Total: \$39.38  
Tue, Sep 25, 2018

# Thanks for tipping, Lesley

Here's your updated Tuesday  
afternoon ride receipt.



## Total \$39.38

---

Trip fare	\$34.38
-----------	---------

---

Subtotal	\$34.38
----------	---------

Tip	\$5.00
-----	--------

---

### Amount Charged



â€¢â€¢â€¢â€¢â€¢â€¢ 3035Switch

\$34.38



â€¢â€¢â€¢â€¢â€¢â€¢ 3035Switch

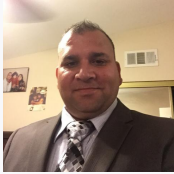
\$5.00

[Download PDF](#)

Download link expires 10/27/18

You rode with pardeep kumar





4.96 ★ Rating

Top Driver Compliment

"Excellent Service"

Issued on behalf of pardeep kumar

Black

4.98 mi | 15 min



03:26pm

JWA Roadway, Santa Ana,  
CA



03:41pm

900 Newport Center Dr,  
Newport Beach, CA



Invite your friends and family.

Get a free ride worth up to \$5 when you refer a  
friend to try Uber. Share code: htc77

REPORT LOST ITEM ^

CONTACT SUPPORT ^

MY TRIPS ^

# Uber

---

[FAQ](#)

[Forgot password](#)

Uber Technologies

1455 Market St

San Francisco, CA 94103

[Privacy](#)

[Terms](#)





Transaction Details Prepared for  
**Lesley Weaver**  
Account Number  
**XXXX-XXXXXX-72007**

DATE	DESCRIPTION	AMOUNT
SEP24 2018	Southwest Airlines - DALLAS, TX	\$593.96

USE PLAN IT<sup>SM</sup> TO SPLIT UP THIS TRANSACTION INTO MONTHLY PAYMENTS FOR A FIXED MONTHLY FEE AND NO INTEREST.

[Create a Plan](#)

Doing business as:

**SOUTHWEST AIRLINES**

[View Details on Merchant Website](#)

PO BOX 36611

DALLAS

TX

75235

UNITED STATES

214.792.4000

Additional Information: 7900234597 (214) 792 - 4223

SOUTHWEST AIRLINES (MASTE

Reference: 320182680577258269

Category: Travel - Airline

**Flight Details**

OAKLAND  
INTERNATIO

✈

SANTA ANA JOHN  
WAY

SANTA ANA JOHN  
WAY

✈

OAKLAND  
INTERNATIO

Passenger Name: WEAVER/LESLEY ELIZABETH

Date of Departure: 09/25

Ticket Number: 5261491541610

Document Type: PASSENGER TICKET

Twitter (bill to  
Twitter)

---

Filer to CME

*Fine*  
*Student for Her*  
ANAHEIM DUCKS  
JOHN WAYNE AIRPORT

Merchant ID : *meditation*  
TERMINAL ID : 261959  
Check # : 5078  
Table # : 908  
Server : 2801 Marjorie  
Acct Num : XXXXXXXXXXXX3035  
Expiry Date : \*\*/\*\*  
Card Type : AMEX  
Trans Type : Authorize  
Trans Date : 9/26/2018  
Trans Time : 5:16 PM  
Entry Mode : swiped  
Auth Code : 501407

Subtotal : \$

GRATUITY: -----

TOTAL: -----


X-----  
Signature  
I Agree to pay total amount as  
per the Card Issuer Agreement.  
Merchant Copy

**\$30.00 Allowed**





Transaction Details Prepared for  
**Lesley Weaver**  
Account Number  
XXXX-XXXXXX-43035

DATE	DESCRIPTION	AMOUNT
SEP26 2018	DELTA AIR LINES - ATLANTA	\$207.20
<div><div><div>Doing business as:</div><div><b>DELTA AIR LINES</b></div><div>View Details on Merchant Website</div><div>1030 DELTA BLVD</div><div>DEPT 680</div><div>ATLANTA</div><div>GA</div><div>30354</div><div>UNITED STATES</div><div>800.221.1212</div><div>Additional Information: 18002211212</div><div>DELTA AIR LINES</div><div>Reference: 320182690600242876</div><div>Category: Travel - Airline</div></div><div><div>Flight Details</div><div><div>LOS ANGELES INTERN</div><div></div><div>OAKLAND INTERNATIO</div></div><div><div>Passenger Name: WEAVER/LESLEY E</div><div>Date of Departure: 09/26</div><div>Ticket Number: 00621614630162</div><div>Document Type: PASSENGER TICKET</div></div></div></div>		

*Twitter  
indication*

**Robertson, Kelsey**

---

**From:** Uber Receipts <uber.us@uber.com>  
**Sent:** Tuesday, March 12, 2019 1:08 PM  
**To:** Weaver, Lesley  
**Subject:** Thanks for tipping! We've updated your Monday afternoon trip receipt



Total: \$6.39  
Mon, Mar 11, 2019

## Thanks for tipping, Lesley

Here's your updated Monday  
afternoon ride receipt.



Total	\$6.39
-------	--------

Trip Fare	\$5.50
-----------	--------

Subtotal	\$5.50
----------	--------

Tolls, Surcharges, and Fees 	\$2.20
---	--------

Promotions	-\$2.31
------------	---------

Tip	\$1.00
-----	--------

Amount Charged	
----------------	--



.... 3035 | [Switch](#)

\$5.39



.... 3035 | [Switch](#)

\$1.00

[Download PDF](#)

Download link expires 4/11/19

You rode with Siraji



4.94  Rating

Top Driver Compliment

"Excellent Service"

Transportation Network Company: Uber Technologies, Inc.

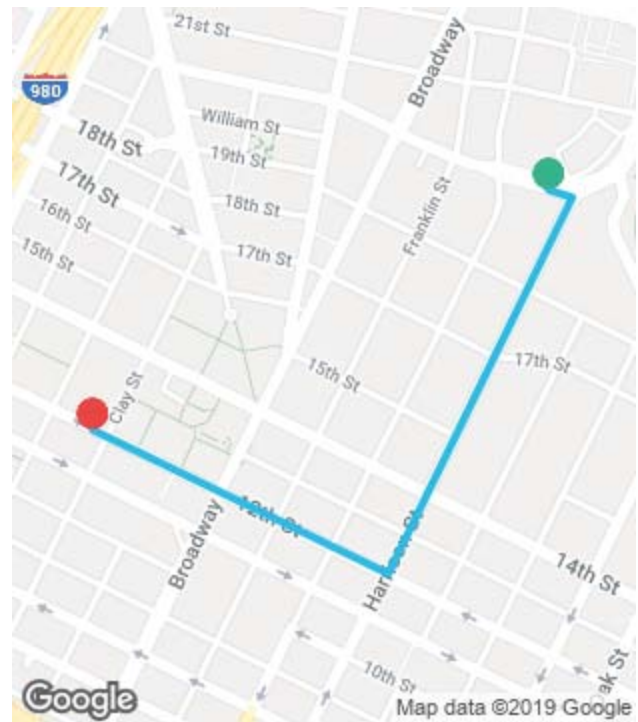
When you ride with Uber, your trips are insured in case of a covered accident. [Learn more.](#)



02:32pm  
309 Thomas L Berkley Way,  
Oakland, CA



02:38pm  
12th & Clay St, Oakland, CA



Invite your friends and family.

Get \$5 off your next ride when you refer a friend to try Uber. Share code: htc77

[REPORT LOST ITEM >](#)

[CONTACT SUPPORT >](#)

[MY TRIPS >](#)





FAQ

Forgot password

Read about our [zero tolerance policy](#). Report a zero tolerance complaint by visiting [help.uber.com](https://help.uber.com).

Uber Technologies  
1455 Market St  
San Francisco, CA 94103

[Privacy](#)

[Terms](#)

**Robertson, Kelsey**

---

**From:** Uber Receipts <uber.us@uber.com>  
**Sent:** Monday, March 11, 2019 2:02 PM  
**To:** Weaver, Lesley  
**Subject:** [Business] Your Monday afternoon trip with Uber



Total: \$5.04  
Mon, Mar 11, 2019


# Thanks for riding, Lesley

We hope you enjoyed your ride  
this afternoon.



# Total \$5.04

You earned 30% off this ride! (up to \$6)

Trip Fare	\$5.00
Subtotal	\$5.00
Tolls, Surcharges, and Fees 	\$2.20
Promotions	-\$2.16
Amount Charged	



.... 3035 | [Switch](#)

\$5.04

[Download PDF](#)

Download link expires 4/10/19

You rode with Sukhsimran



4.9  Rating

How was your ride?

[RATE OR TIP](#)

Top Driver Compliment

"Great Conversation"

Transportation Network Company: Uber Technologies, Inc.

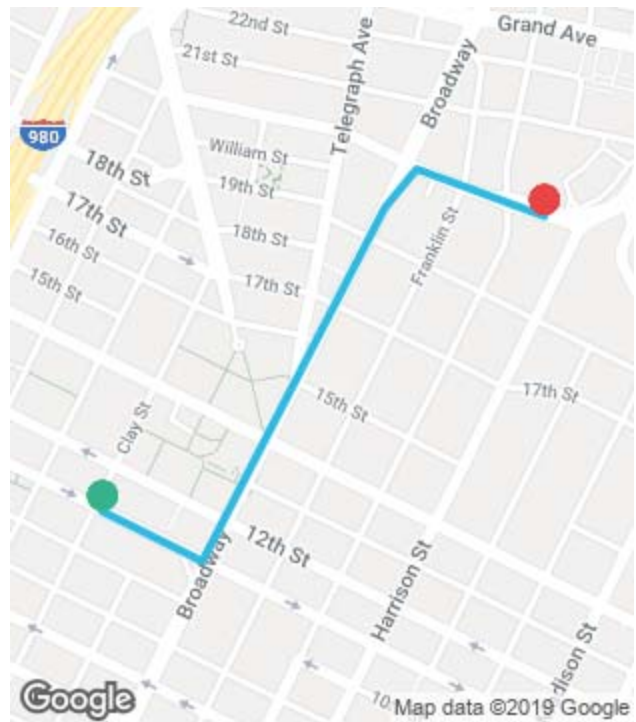
When you ride with Uber, your trips are insured in case of a covered accident. [Learn more.](#)



01:56pm  
1001 Broadway, Oakland, CA



02:01pm  
Lake Merritt Plaza, Oakland,  
CA



Invite your friends and family.

Get \$5 off your next ride when you refer a friend to  
try Uber. Share code: htc77

[REPORT LOST ITEM >](#)

[CONTACT SUPPORT >](#)

[MY TRIPS >](#)



FAQ

Forgot password

Read about our [zero tolerance policy](#). Report a zero tolerance complaint by visiting [help.uber.com](https://help.uber.com).

Uber Technologies  
1455 Market St  
San Francisco, CA 94103

[Privacy](#)

[Terms](#)

# **Exhibit 10**



*In re Twitter Inc. Securities Litigation*  
Case No. 4:16-cv-05314-JST (SK)  
Honorable Jon S. Tigar

**OVERVIEW**

Bleichmar Fonti & Auld LLP (“BFA” or the “Firm”) is a law firm based in New York City with offices in Oakland, California; Toronto, Ontario; and White Plains, New York. The Firm has recovered more than \$18 billion for its clients since its founding in 2014. The Firm focuses solely on affirmative litigation in highly significant matters, including consumer, securities, and antitrust actions both in the United States and abroad. We represent a wide range of domestic and foreign clients, including some of the largest institutional investors and asset managers in the world as well as small businesses and individual consumers.

Three unique aspects of our firm distinguish BFA from others: (1) our selectivity in choosing cases; (2) the high quality lawyering our diverse team provides; and (3) a commitment to our clients’ needs ahead of our own. Because of this, BFA enjoys a reputation as a highly ethical, discerning, and sophisticated boutique firm.

*First*, we are extremely selective in the cases we choose to litigate, and the strength of our litigation skills is second to none. Our clients’ reputations are at stake in every case they pursue, and we guard their reputations zealously. As a result, we are often asked by our clients to serve as the dissenting voice when our peers are recommending a case we do not like. We only recommend cases that fit within our clients’ objectives and do so very seldomly.

We strive for quality and not quantity in every aspect of our practice. This allows us to dedicate a significant amount of resources to each individual case. Complex litigation requires a substantial investment of money, time, and resources. It is only with dedicated resources that a well-thought-out litigation strategy can be executed forcefully and effectively. We don’t spread ourselves too thin and instead strive to take cases deep into litigation. Our results, discussed below, show that we obtain outsized settlements and reflect the high quality of our work product.

*Second*, we strive to provide our clients with objective, comprehensive counsel, including about whether or not participation in specific litigation serves the best interests of the client. We have a strong commitment to candid and unvarnished advice, made possible through our independence from litigation funding. In addition, BFA provides advice on multiple other aspects such as the development of the law and the risk of fee-shifting provisions, as well as the reputational risk, if any, of participating in any particular litigation.

*Third*, BFA’s attorneys have decades of experience litigating complex, high profile cases of import. We launched BFA in large measure to break away from many of the standard practices of the more established and larger plaintiffs’ firms. We do not hold an “inventory” of cases (which effectively includes weak ones) to ensure a steady cash-flow stream over the years. The high quality of our lawyers and successful case resolutions allows us to carry out that strategy.

In sum, we are distinguished by our candid counsel, deep experience, and proven results.



## U.S. SECURITIES LITIGATION HIGHLIGHTS

BFA partners have represented lead plaintiffs in more than a dozen securities class actions in the last decade, including seven since the Firm was founded, as described below. Lesley Weaver has also played leading roles in significant securities settlements, including *Marsh & McLennan* (\$400 million), and *In re Twitter Inc. Securities Litigation* (\$809.5 million), where she served as Liaison Counsel.

### *The Police Retirement System of St. Louis v. Granite Construction Incorporated, et al.*

- Northern District of California, No. 19-cv-04744
- Client: The Police Retirement System of St. Louis
- Lead Attorneys: Javier Bleichmar

Total Settlement:  
\$129 Million

Background: Plaintiffs allege that Granite and its senior management fraudulently misrepresented the impact of several of the company's largest joint venture construction projects on Granite's business. Specifically, plaintiffs assert that Granite and its senior management understated the significant cost overruns and schedule delays that the Company was experiencing as well as their impact on Granite's financial statements.

BFA's Role: BFA is sole Lead Counsel for Court-appointed Lead Plaintiff the Police Retirement System of St. Louis.

Status: On March 17, 2022, the Court granted final approval of a \$129 million settlement.

### *Ontario Teachers' Pension Plan Board, et al v. Teva Pharmaceutical Industries Ltd. et al.*

- District of Connecticut, No. 17-cv-00558
- Clients: Ontario Teachers' Pension Plan Board and Anchorage Police and Fire Retirement System
- Lead Attorney: Joseph A. Fonti

Case Status:  
Proposed \$420 Million  
Settlement Pending  
Court Approval

Background: Plaintiffs allege that the company and its senior management made materially false and misleading statements that concealed that Teva had engaged in a multi-year scheme to exponentially increase generic drug prices across its portfolio, in some instances by more than 1000%. Often, these increases were in lock-step with so-called competitors.

BFA's Role: BFA is sole Lead Counsel for Court-appointed Lead Plaintiff Ontario Teachers' and named plaintiff Anchorage Police and Fire Retirement System.

Status: The Court appointed Ontario Teachers' as Lead Plaintiff and approved its choice of BFA as Lead Counsel on July 11, 2017. BFA filed an amended complaint on June 22, 2018. In September 2019, the Court denied defendants' motion to dismiss and in December 2019, BFA filed a further amended complaint. In March 2020, the Court granted BFA's motion for consolidation. On March 9, 2021, Judge Underhill granted BFA's motion to certify a class of Teva investors. Judge Underhill also granted BFA's motion to appoint the Ontario Teachers' Pension Plan Board and Anchorage Police and Fire Retirement System as Class Representatives, and BFA as Class Counsel. On January 18, 2022, BFA secured a \$420 million settlement for the class. The Court granted preliminary approval of the settlement on January 27, 2022.

#### *In re Citigroup Securities Litigation*

- Southern District of New York, No. 20-CV-9132
- Client: Public Sector Pension Investment Board ("PSP")
- Lead Attorneys: Javier Bleichmar, Joseph A. Fonti, Erin H. Woods

Case Status:  
Pending

Background: Plaintiffs allege that Citigroup and its senior management misrepresented and concealed that the company's internal controls and risk management systems suffered from serious and longstanding deficiencies that exposed the Company to massive regulatory penalties that will cost significantly more than \$1 billion to remediate.

BFA's Role: BFA is sole Lead Counsel for Court-appointed Lead Plaintiff PSP.

Status: The Court appointed PSP as Lead Plaintiff and approved its choice of BFA as Lead Counsel on February 4, 2021. BFA filed an Amended Complaint on April 20, 2021.

#### *In re Align Technology, Inc. Securities Litigation*

- Northern District of California, No. 17-cv-5114
- Client: Macomb County Employee's Retirement System
- Lead Attorneys: Javier Bleichmar, Nancy Kulesa

Case Status:  
Pending

Background: Plaintiffs allege Align and its senior management materially overstated the Company's performance in China and misrepresented and concealed significant declines in Chinese demand for Align's products and the deteriorating sentiment of Chinese consumers towards the Company's products.

BFA's Role: BFA is sole Lead Counsel for Court-appointed Lead Plaintiff Macomb County Employee's Retirement System.

Status: The Court appointed Macomb County Employee's Retirement System as Lead Plaintiff and approved its choice of BFA as Lead Counsel on May 20, 2020. After BFA filed an Amended Complaint, the Court dismissed the case on March 9, 2021 with the opportunity to replead. Lead Plaintiff filed an appeal on May 6, 2021. The appeal is pending.

*MTA v. Allianz Global Investors U.S., L.L.C.*

- Southern District of New York, No. 20-CV-7842
- Client: Metropolitan Transportation Authority
- Lead Attorneys: Javier Bleichmar, George Bauer

Case Status:  
Pending

Background: Since 2008, the Metropolitan Transportation Authority ("MTA") invested nearly \$200 million in Allianz Global Investor's ("AllianzGI") Structured Alpha funds. Due to AllianzGI's negligent and imprudent trading strategies and its failure to implement adequate risk management procedures, despite its commitment to do so, the MTA lost over 90% of its investment. AllianzGI's failure cost the MTA and similar institutional investors hundreds of millions of dollars.

BFA's Role: BFA represents the MTA in their suit against AllianzGI.

Status: BFA filed a complaint against AllianzGI on behalf of the MTA in September 2020. On September 30, 2021, the Court denied defendants' motion to dismiss.

*In re MF Global Holdings Ltd. Securities Litigation*

- Southern District of New York, No. 11-cv-07866
- Client: Alberta Investment Management Corp. (AIMCo)
- Lead Attorneys: Javier Bleichmar, Dominic Auld

Total Settlements:  
\$234.3 Million

Background: This litigation arose from MF Global's dramatic bankruptcy in October 2011. Plaintiffs alleged that Defendants misrepresented the company's risk controls, liquidity position, and exposure to European sovereign debt, and failed to properly account for its deferred tax assets.

BFA's Role: BFA represented Court-appointed Co-Lead Plaintiff AIMCo. Partners Javier Bleichmar and Dominic Auld represented AIMCo in this case since its inception in November 2011, and served as Court-appointed Co-Lead Counsel for the putative class since January 2012. When BFA launched in August 2014, the Court approved AIMCo's selection of BFA to serve as Co-Lead Counsel for the putative class, continuing the core litigation team's representation.

Status: Lead Counsel achieved five partial settlements worth a total of just over \$234 million on behalf of investors: (1) a \$74 million settlement with Goldman Sachs and certain other underwriters of the company's securities; (2) a \$64.5 million settlement with former officers and directors, including MF Global's former CEO Jon Corzine; (3) a \$65 million settlement with auditor PricewaterhouseCoopers; (4) a \$29.825 million settlement with Jefferies and other underwriters of the final bond offering issued during the Class Period; and (5) a separate \$932,828 settlement with another underwriter defendant associated with that last offering. These settlements represent a recovery of approximately 35% of the alleged damages – an excellent result, particularly in light of the issuer's bankruptcy.

These settlements were achieved after years of hard fought litigation. Following the Court's ruling sustaining the Complaint and denying Defendants' six motions to dismiss in their entirety, Co-Lead Counsel reviewed millions of documents produced by Defendants and third-parties, and conducted more than 50 depositions of former employees of MF Global and other key witnesses, including four days of testimony from former CEO Jon Corzine. The Court granted Plaintiffs' motion for class certification on October 14, 2015, which assisted in achieving the settlements.

*In re Genworth Financial Inc. Securities Litigation*

- Eastern District of Virginia, No. 14-cv-00682
- Client: Alberta Investment Management Corp.
- Lead Attorney: Joseph A. Fonti

Total Settlement:  
\$219 Million

Background: Plaintiffs alleged that Defendants misrepresented the profitability of the company's core business and reported false financial results by grossly understating long-term care insurance reserves. When Genworth announced a \$531 million charge to its reserves, the company's stock price fell more than 55% – wiping out billions in market capitalization – and credit rating agencies downgraded the company and its corresponding debt to “junk” status.

BFA's Role: BFA represented Court-appointed Co-Lead Plaintiff AIMCo. In November 2014, the Court approved AIMCo's selection of BFA to serve as Co-Lead Counsel for the putative class.

Notably, BFA secured one of the most thoroughly-reasoned, investor-oriented decisions after the then-recent decision in *Omnicare v. Laborers District Council Construction Industry Pension Fund*, 135 S. Ct. 1318 (2015).<sup>1</sup> The District Court ruled

<sup>1</sup> The decision in *Omnicare* clarified the legal standard about pleading statements by defendants that are deemed to be opinions, rather statements of fact. The Supreme Court sought to limit liability for opinion statements, making it more difficult for plaintiffs to sustain

that Lead Plaintiffs had sufficiently pled that Defendants' statements were intended to mislead investors and to provide false assurances regarding the company's reserves. The District Court also largely sustained allegations that Defendants falsely certified that the company's internal controls were adequate.

Status: On March 10, 2016, Genworth announced a proposed settlement of \$219 million, the largest ever securities class action recovery achieved in Virginia, and as much as 44% of recoverable damages available at trial. BFA and AIMCo sought and achieved a significant contribution from the company beyond available insurance; despite significant liquidity issues, the company paid \$69 million, and the remaining \$150 million was funded by insurance.

The settlement was reached after 15 months of intense and complex litigation. The Eastern District of Virginia is known as the "rocket docket" for its rapid disposition of cases and strict adherence to scheduled deadlines. In December 2014, Lead Plaintiffs filed a consolidated complaint and, in February 2015, Defendants filed a motion to dismiss. Partner Joseph Fonti successfully argued against the motion on April 28, 2015, and the securities fraud claims were sustained on May 1, 2015. Lead Plaintiffs filed their motion for class certification on December 3, 2015; fact discovery closed on January 15, 2016; and expert discovery closed on February 11, 2016. In effect, BFA conducted two to four years of litigation in just 15 months. This effort included more than 20 depositions, extensive trial preparation, and full briefing on motions for class certification and summary judgment. At the time of settlement, BFA attorneys were preparing for trial, which was scheduled to begin on May 9, 2016.

*In re Weatherford International Securities Litigation*

- Southern District of New York, No. 12-cv-02121
- Client: Anchorage Police and Fire Retirement System
- Lead Attorney: Javier Bleichmar

Total Settlement:  
\$120 Million

Background: Plaintiffs alleged that Weatherford, one of the world's largest oil and gas servicing companies, issued false financial statements that misled investors about its tax structure and internal controls. The company allegedly overstated its earnings by more than \$900 million and was forced to issue three restatements due to its failure to comply with Generally Accepted Accounting Principles.

---

their allegations. The decision secured in *Genworth*, on behalf of BFA's client AIMCo, ruled that certain categories of statements around accounting reserves were not opinions, and therefore actionable.

BFA's Role: BFA represented Court-appointed Co-Lead Plaintiff Anchorage Police and Fire Retirement System in this case, and BFA partner Javier Bleichmar represented Anchorage continuously since the case was filed in March 2012.

Status: In June 2015, the company agreed to settle all claims for \$120 million of out-of-pocket cash, with no available insurance, or approximately 30% of recoverable damages. Achieving this settlement required more than three years of intense litigation, including defeating Defendants' motion to dismiss in its entirety; obtaining class certification; completing fact discovery, after more than 20 depositions and the review of more than eight million pages of documents; filing four expert reports; and preparing for expert discovery and summary judgment.

*In re Computer Sciences Corp. Securities Litigation*

- Eastern District of Virginia, No. 11-cv-00610
- Client: Ontario Teachers' Pension Plan Board
- Lead Attorney: Joseph A. Fonti

Total Settlement:  
\$97.5 Million

Background: Plaintiffs alleged that the company and two of its executive officers misrepresented (i) a multi-billion-dollar contract with the United Kingdom's National Health Service, and (ii) that the company's internal controls were adequate.

BFA Role: BFA partners Javier Bleichmar, Joseph A. Fonti, and Dominic Auld represented Court-appointed Lead Plaintiff Ontario Teachers' at all stages of this case. Upon the founding of the Firm, the Court approved Ontario Teachers' Pension Plan Board's selection of BFA as counsel, continuing the team's representation.

Status: On September 2013, the Court granted final approval to the \$97.5 million settlement. At that time, the settlement was the second largest all cash recovery ever achieved in the Eastern District of Virginia, and represented as much as 38% of recoverable damages at trial.

*In re Celestica Inc. Securities Litigation*

- Southern District of New York, No. 07-cv-00312
- Client: New Orleans Employees' Retirement System
- Lead Attorney: Joseph A. Fonti

Total Settlement:  
\$30 Million

Background: Plaintiffs alleged false and misleading statements relating to a significant corporate restructuring plan, earnings, profitability, and financial outlook. When Celestica ultimately disclosed the truth, its stock price dropped 50%, reducing market capitalization by \$1.3 billion.



BFA's Role: BFA partners Joseph Fonti and Erin Woods represented Lead Plaintiffs in this litigation. Notably, Joseph was successful in arguing before the Court of Appeals for the Second Circuit, securing an investor-oriented interpretation of the pleading standard for scienter. Joseph also successfully argued in favor of Plaintiffs' class certification and summary judgment motions before the District Court, securing the first lower court decision after *Halliburton Co. v. Erica P. John Fund, Inc.*, 134 S. Ct. 2398 (2014) in favor of investors on the issue of class-wide reliance.

Status: In April 2015, Plaintiffs filed a motion for preliminary approval of a proposed \$30 million settlement resolving all claims against the company and officer defendants. The final approval hearing was held on July 28, 2015 and, later that day, the Court approved the \$30 million settlement.

\*

\*

\*

BFA attorneys have also played key roles in some of the most significant investor protection litigation in recent history, helping shareholders recover significant losses caused by financial misconduct in various industries across the marketplace. Select cases include:

*In re Broadcom Corp. Class Action Litigation*, Civ. No. 06-cv-5036 (C.D. Cal.).

This class action against Broadcom was based on allegations that the company inflated its stock price by intentionally backdating its stock option grants for over five years. Ultimately, the company was forced to issue a \$2.2 billion restatement of its financial statements for the period spanning from 1998 through 2005, which became the largest restatement ever due to options backdating.

The company acknowledged the "substantial evidence" of backdating, and lead plaintiffs secured a \$173.5 million settlement, which, at the time, was the second largest cash settlement ever involving a company accused of options backdating. This was also the only such case in which claims against the auditors were sustained.

*In re HealthSouth Corp. Securities Litigation*, Civ. No. 03-cv-1501-S (N.D. Ala.).

This case involved the largest securities fraud ever arising out of the healthcare industry, and ultimately resulted in a total settlement amount of \$804.5 million for the class. The class action involved claims against HealthSouth for falsifying its revenues and conducting a series of acquisition transactions in order to effectuate a massive fraud against the Medicare system.

False statements by the company and its officers led to the inflation of HealthSouth's stock price, while at the same time company executives were

amassing significant personal wealth by selling their own shares of HealthSouth stock.

Significantly, the litigation also resulted in the recovery of \$109 million from HealthSouth's outside auditor Ernst & Young LLP, one of the largest recoveries to date against an auditing firm.

*In re Schering-Plough Corp. / ENHANCE Securities Litigation*, Civ. No. 08-397 (D.N.J.).

Lead Plaintiffs brought litigation in the District of New Jersey against Schering-Plough Corporation and Merck/Schering-Plough Pharmaceuticals, and certain company officers, in *In re Schering-Plough Corp. / ENHANCE Securities Litigation*, alleging that they failed to disclose material information about the prospects of cholesterol-lowering drugs.

After nearly six years of litigation, Defendants agreed to pay \$473 million to settle the matter on the eve of trial. This marked the largest securities class action recovery in history obtained from a pharmaceutical company. Together with a related securities class action against Merck, the *ENHANCE* litigation settled for \$688 million.

\*

\*

\*



## CONSUMER LITIGATION HIGHLIGHTS

Lesley E. Weaver specializes in consumer and antitrust work in significant matters. She has been appointed to leadership positions in some of the most significant consumer actions of recent years, including: *In re Volkswagen “Clean Diesel” Marketing, Sales Practices, and Products Liability Litigation*, which resulted in settlements totaling greater than \$15 billion; and *In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices and Products Liability*, which resulted in a settlement of \$307.5 million. She currently serves as Co-Lead Counsel for Plaintiffs in *In re Facebook, Inc. Consumer Privacy User Profile Litigation*, as well as acting co-lead counsel in *Calhoun, et al. v. Google LLC* and *In re Google RTB Consumer Privacy Litigation*, all of which are currently pending. These, and additional matters, are described below.

### *In re Volkswagen “Clean Diesel” Marketing, Sales Practices, and Products Liability Litigation*

- MDL No. 2672
- Northern District of California, No. 3:15-md-02672

Total Settlements:  
\$15 Billion

Background: This landmark case resolved claims against Volkswagen, Audi and Porsche in connection with the widely-reported news that the companies had installed emission systems created to avoid regulator detection and defraud customers who believed they were buying Volkswagen and Audi vehicles with “clean diesel” engines. VW admitted that it installed these “defeat devices,” which eliminated the emissions reduction during normal driving, and only allowed for reduced fuel emissions when the automobiles were being tested. More than 500 federal lawsuits were filed and consolidated into one complaint against the automaker for its “dirty diesel” vehicles.

BFA’s Role: Judge Charles R. Breyer appointed Ms. Weaver to the Plaintiffs’ Steering Committee, which, along with lead counsel, has been described as the “dream team” prosecuting this high-profile emissions scandal. Judge Breyer selected Ms. Weaver from a field of 150 of the nation’s finest attorneys. Ms. Weaver’s leadership position in the case included spearheading the investigation that ultimately uncovered German auto supplier Robert Bosch GmbH’s significant role in multiple schemes to place software in vehicles purposefully designed to evade emissions laws. She also led the investigation into additional claims relating to defeat devices in certain gas vehicles, resulting in an additional \$96.5 million settlement for the Class.

Status: Lead Counsel and the Plaintiffs’ Steering Committee have achieved settlements for Plaintiffs worth approximately \$15 billion, the largest automotive class action recovery in history. This includes a \$14.7 billion settlement on behalf of eligible owners of Volkswagen and Audi 2.0-liter TDI cars, who were offered a

buyback of their cars. In accordance with the consent decree, \$2.7 billion of the settlement will be allocated to projects to reduce nitrogen oxides emissions, with a focus on improving air quality in areas that “bear a disproportionate share of the air pollution burden within their jurisdiction.” As the Justice Department’s top environmental attorney John Cruden has highlighted, this focus on remediation in low income and minority communities is “unique,” and a significant response to the disproportionate pollution burden felt by these communities.

On March 2, 2020, Judge Breyer granted final approval of a \$96.5 million settlement for more than 100,000 consumers who purchased or leased certain gasoline-powered Audi, Volkswagen, Porsche, and Bentley vehicles that were initially labeled and marketed with overstated fuel economy and understated carbon dioxide emissions.

Lead Counsel and the Plaintiffs’ Steering Committee continue to pursue claims against Defendants related to Porsche-branded gasoline vehicles.

*In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices and Products Liability Litigation*

- MDL No. 2777
- Northern District of California, No. 3:17-md-02777

Total Settlements:  
\$307.5 Million

Background: The class alleges that Fiat Chrysler Automobiles deliberately cheated on emission testing of 2014-2016 model Dodge and Jeep trucks marketed and sold as environmentally friendly “eco-diesel” vehicles.

BFA’s Role: Judge Edward Chen of the U.S. District Court for the Northern District of California appointed Ms. Weaver as one of nine members of the Plaintiffs’ Steering Committee. Ms. Weaver played a key role in litigating the action, including taking depositions and coordinating with experts.

Result: The case has settled for \$307 million in cash in addition to extended warranties worth more than \$120 million.

*In re Facebook, Inc. Consumer Privacy User Profile Litigation*

- MDL No. 2843
- Northern District of California, No. 3:18-md-02843

Case Status:  
Pending

Background: This high-profile case seeks redress for Facebook users in the U.S whose private content was unlawfully shared with thousands of third parties. The detailed complaint documents Facebook’s violations of consumer fraud and privacy laws in allowing third party apps, including Cambridge Analytica, to bundle and sell Facebook users’ private information without their knowledge or consent.

BFA's Role: In a contested and highly competitive field, Judge Chhabria of the Northern District of California appointed Ms. Weaver as Co-Lead Counsel for Plaintiffs.

Status: In September 2019, Judge Chhabria of the Northern District of California largely denied Facebook's motion to dismiss, finding Facebook's argument that plaintiffs have no right to allege a breach of privacy based upon Facebook's sharing of their information with third parties "could not be more wrong." On March 10, 2020, the matter was assigned to Magistrate Judge Corley for the management of discovery. On October 29, 2020, Plaintiffs received a favorable ruling concerning the scope of discovery at issue in the MDL litigation. The order ruled that discoverable user data includes: 1) Data collected from a user's on-platform activity; 2) Data obtained from third parties regarding a user's off-platform activities; and 3) Data inferred from a user's on or off-platform activity. Discovery is ongoing.

#### *Calhoun et al. v. Google LLC*

- Northern District of California, No. 4:20-cv-05146-YGR

Case Status:  
Pending

Background: This nationwide data privacy class action is brought on behalf of Google Chrome users alleging that Google violated its express promise not to take users' personal data when using the Chrome browser outside of synched mode.

BFA's Role: BFA is acting as co-lead counsel representing the class of Chrome users in this litigation.

Status: In March 2021, this Court issued an order denying in part Google's motion to dismiss. The order upheld Plaintiffs' contract, privacy, and other claims. The order, found that that Chrome users' data—including browsing history, cookies, and other site data—is their property and that Plaintiffs had alleged Google's unlawful collection of such data constitutes theft. Further, the order upheld claims that Google acted in bad faith when it collected users' data in circumvention of cookie blockers.

#### *In re Google RTB Consumer Privacy Litigation*

- Northern District of California, No. 4: 21-cv-02155-YGR

Case Status:  
Pending

Background: The case is the first in the country to demand transparency about what information Google reveals about its users when it auctions ad placements to Google users through Google's "Real-Time Bidding" system.

BFA's Role: Ms. Weaver is a member of the Plaintiffs' Executive Committee.

Status: The parties have briefed a motion to dismiss briefing.

*In re: ZF-TRW Airbag Control Units Products Liability Litigation*

- Central District of California, No. 2:19-MD-02905

Case Status:  
Pending

Background: The class action complaint alleges the ZF-TRW airbag and seat belt control units in over 15 million cars sold are defective and may prevent airbags from inflating in the event of crash. This defect has been linked to at least eight deaths and several serious injuries. The complaint names as defendants ZF-TRW, STMicro, and vehicle manufacturers, Kia, Hyundai, Hyundai MOBIS, Fiat Chrysler, Toyota, Honda, and Mitsubishi.

BFA's Role: Judge John A. Kronstadt of the U.S. District Court for the Central District of California appointed Lesley Weaver to the Plaintiffs' Steering Committee for the multidistrict litigation.

Status: The parties have briefed motions to dismiss, to stay discovery, and to compel arbitration.

\* \* \*

## U.S. ANTITRUST LITIGATION HIGHLIGHTS

Lesley E. Weaver has been appointed to leadership positions in significant antitrust actions. In addition, Lesley and her team play key roles in many additional matters, as described below.

### *In re Domestic Airlines Travel Antitrust Litigation*

- District of Columbia, No. 1:15-mc-01404

Case Status:  
\$60 million in partial  
settlements;  
Remaining litigation  
pending

Background: Plaintiffs allege a conspiracy by the four largest commercial air passenger carriers in the United States—American Airlines, Inc., Delta Airlines, Inc., Southwest Airlines Co., and United Airlines, Inc.—to fix prices for domestic air passenger transportation services in violation of the Sherman Act by colluding to limit capacity on their respective airlines.

BFA's Role: BFA is a key part of Plaintiffs' nonparty discovery committee and has led meet and confer negotiations with dozens of nonparties, resulting in the production of some of Plaintiffs' best evidence.

Status: Plaintiffs have settled for \$15 million with Defendant Southwest Airlines and \$45 million with Defendant American Airlines. The parties are briefing motions for summary judgment brought by the remaining Defendants.

### *In re Local TV Advertising Antitrust Litigation*

- MDL No. 2867
- Northern District of Illinois, No. 1:18-cv-0678

Case Status:  
Pending

Background: Plaintiffs allege a price fixing cartel facilitated by an anticompetitive information exchange between and among certain major television station owners and operators to artificially inflate the prices of broadcast television spot advertisements.

BFA's Role: BFA acts as counsel for One Source Heating & Cooling, LLC and is an integral member of the litigation team.

Status: On November 6, 2020, Judge Virginia Kendall of the Eastern District of Illinois denied Defendants' motion to dismiss. Discovery in this matter is ongoing.

*In re Disposable Contact Lens Antitrust Litigation*

- MDL No. 2626
- Middle District of Florida, No. 3:15-md-02626

**Case Status:**  
\$40 million in settlements; Remaining litigation currently at trial

Background: Plaintiffs allege claims for horizontal and vertical conspiracies in violation of state and federal antitrust laws due to unilateral pricing policies of four leading contact lens manufacturers.

BFA's Role: BFA is leading discovery efforts against the largest manufacturer, Johnson & Johnson.

Status: Plaintiffs have settled with Defendant CooperVision, Inc. for \$3 million and with Defendant Bausch & Lomb for \$10 million. Plaintiffs have also sought final approval of a proposed \$30.2 million settlement with ABB Optical Group LLC. The parties are currently in trial for claims against the remaining Defendants.

*In re Mexican Government Bonds Antitrust*

- S.D.N.Y., No. 1:18-cv-02830

**Case Status:**  
\$21 million in settlements; Remaining litigation pending

Background: Plaintiffs allege that Defendant broker-dealers have fixed auctions for securities issued by the Mexican government and manipulated the bid-ask spread in transactions to U.S.-based investors, causing U.S.-based investors to pay artificially inflated prices for their Mexican government bonds.

BFA's Role: BFA represents Southeastern Pennsylvania Transit Authority and is assisting the team litigating the case in the Southern District of New York.

Status: Plaintiffs have negotiated ice-breaker settlements with JPMorgan for \$15 million and Barclays PLC for \$5.7 million, totaling \$20.7 million in addition to cooperation in litigating against the remaining defendants, and filed a highly detailed complaint based in part on highly incriminating documents received from the cooperating defendants. The remaining Defendants' motion to dismiss is pending.

*In re Farm-Raised Salmon and Salmon Products Litigation*

- Southern District of Florida, No. 19-CV-21551

**Case Status:**  
Pending

Background: Plaintiffs seek redress from Atlantic salmon producers who fixed prices of farm-raised Atlantic salmon sold in the United States, including Norwegian producers. Alleged conduct includes coordinating sales prices and exchanging

commercially sensitive information, agreeing to purchase production from other competitors when those other competitors were selling at lower prices, and applying a coordinated strategy to increase spot prices in order to secure higher price levels for long term contracts. As a result, since 2015 farm-raised Atlantic salmon prices have been artificially inflated.

Role: BFA is working closely with the executive team facilitating jurisdictional discovery.

Status: On March 23, 2021, the Court denied Defendants' motion to dismiss, finding Plaintiffs have alleged a plausible conspiracy existed through circumstantial facts.

#### *In re Packaged Seafood Products Antitrust Litigation*

- MDL No. 2670
- Southern District of California, No. 3:15-md-02670

Case Status:  
Pending

Background: Plaintiffs allege defendants entered into a conspiracy involving packaged seafood product in violation of the Sherman Act and state antitrust law.

BFA's Role: BFA is part of a critical discovery effort against a key defendant.

Status: On July 30, 2019, the Honorable District Judge Janis L. Sammartino of the Southern District of California granted class certification to a class of direct purchasers. In January 2021, Direct Purchaser Plaintiffs and Defendant Tri-Union Seafoods d/b/a Chicken of the Sea International and Thai Union Group PCL announced a settlement agreement in principle. The remaining parties have briefed motions for summary judgment.

#### *In re Blood Plasma Antitrust Litigation*

- MDL No. 2109
- Northern District of Illinois, No. 1:09-cv-07666

Total Settlements:  
\$128 Million

Background: Plaintiffs allege that Defendants participated in a multi-year conspiracy to restrict output and fix prices of Ig and Albumin in the United States.

BFA's Role: Ms. Weaver played a significant role, including deposing the Chief Operating Officer and Chief Marketing Officer of one of the main defendants.

Result: In 2014, the Court granted final approval of the settlements between plaintiffs Defendants Baxter International, Inc., Baxter Healthcare, CSL Limited, CSL Behring LLC, CSL Plasma Inc., and the Plasma Protein Therapeutics Association, for a total settlement worth \$128 million.

*In re Lithium Ion Batteries Antitrust Litigation*

- MDL No. 2420
- Northern District of California, No. 4:13-md-02420

Total Settlements:  
\$64.5 Million

Background: Plaintiffs allege that defendants and their co-conspirators engaged in an unlawful conspiracy to fix the prices of lithium ion battery cells, affecting the prices indirect purchasers paid for lithium ion batteries and lithium ion products. Indirect Purchaser Plaintiffs have settled their claims for \$19.5 million from Sony Corp., \$39 million from LG Chem Ltd., \$3.45 million from Hitachi Maxwell Ltd., and \$2.5 million from NEX Corp.

BFA's Role: BFA represents the cities of Palo Alto and Richmond, California.

Result: On October 27, 2017, the Court gave final approval to the settlement between the IPPs and Hitachi Maxell, NEC Corporation, and LG Chem. The settlement was worth \$45 million, bringing the total settlements with IPPs to \$64.5 million.

\* \* \*



## NON-U.S. LITIGATION HIGHLIGHTS

In the past five years, we have acted and advised clients in a liaison capacity for their participation in over thirty shareholder claims in Australia, England, Germany, the Netherlands, Denmark, France, Spain, Italy, Japan, Brazil, and other jurisdictions. The list below is representative but not exhaustive. We have assisted, and continue to assist, our clients in connection with matters that remain confidential, including efforts to secure private settlements without formal action.

**CIMIC Group Ltd.** (formerly Leighton Holdings Ltd.) (Australia) – advised public pension funds on registering claims

**Fortis SA/NV** (now known as Ageas) (Belgium / Netherlands) – liaison counsel to public pension funds

**QBE Insurance Group Ltd.** (Australia) – advised public pension funds

**Treasury Wine Estates Ltd.** (Australia) – advised public pension funds

**Olympus Corp.** (Japan) – liaison counsel to public pension funds

**OZ Minerals Ltd.** (Australia) – advised public pension funds

**Credit Suisse Group AG** (Switzerland) – liaison counsel to public pension fund

**Wirecard AG** (Germany) – liaison counsel to public pension funds

**Vale S.A.** (Brazil) – liaison counsel to public pension funds

**BRF S.A.** (Brazil) – liaison counsel to public pension funds

**Novo Nordisk AS** (Denmark) – liaison counsel to public pension funds

**Kobe Steel, Ltd.** (Japan) – liaison counsel to public pension fund

**Danske Bank AS** (Denmark) – liaison counsel to public pension funds

**Steinhoff International Holdings NV** (Netherlands / Germany / South Africa) – liaison counsel to public pension funds

**Volkswagen AG** (Germany) – liaison counsel to public pension funds

**Porsche Automobil Holding SE** (Germany) – liaison counsel to public pension funds

**Mitsubishi Motors Corp.** (Japan) – liaison counsel to public pension funds

Toshiba Corp. (Japan) – liaison counsel to public pension funds

Saipem SpA (Italy) – liaison counsel to public pension fund

Vivendi Universal SA (France) – liaison counsel to public pension funds

Daimler AG (Germany) – advising public pension funds

Petroleo Brasileiro SA (Brazil / Netherlands) – advising public pension funds

Tesco PLC (England) – advising public pension funds

BFA also evaluates clients’ eligibility to participate in Australian class actions that do not require a litigation funding agreement based on an analysis of the client’s trading history. In the past five years, we have identified and advised clients in regard to over 25 recovery opportunities in Australia, including the following actions: Allco Finance Group Ltd.; AMP Ltd.; Ashley Services Group Ltd.; Bellamy’s Australia Ltd.; Crown Resorts Ltd.; Discovery Metals Ltd.; Downer EDI Ltd.; DSHE Holdings Ltd. (f.k.a. Dick Smith Holdings Ltd.); Estia Health Ltd.; GetSwift Ltd.; Iluka Resources Ltd.; Macmahon Holdings Ltd.; Murray Goulburn / MG Unit Trust; Myer Holdings Ltd.; QRxPharma Ltd.; Quintis Ltd.; Sims Ltd. (f.k.a. Sims Metal Management Ltd.); Sirtex Medical Ltd.; Slater & Gordon Ltd.; Spotless Group Holdings Ltd.; Surfstitch Group Ltd.; Treasury Wine Estates Ltd. ; UGL Ltd.; Vocation Ltd.; Vocus Group Ltd.; Woolworths Group Ltd. (f.k.a. Woolworths Ltd.); and WorleyParsons Ltd.

\*

\*

\*

## TEAM PROFILES

LESLEY E. WEAVER  
*Partner*

Oakland

- Email: [lweaver@bfalaw.com](mailto:lweaver@bfalaw.com)
- Tel: +1 415 455 4004
- [www.bfalaw.com/professionals/lesley-weaver](http://www.bfalaw.com/professionals/lesley-weaver)

Lesley E. Weaver leads the Firm's Antitrust and Consumer Litigation Practice. Lesley joined BFA as a partner in 2016, opening the Firm's California office. In her twenty-year career, Lesley has focused primarily on cases that protect the public interest, consumers, and public entities. She has substantial leadership experience litigating complex antitrust and consumer-oriented class litigation, and has been appointed to leadership positions in some of the largest class actions in the country. In 2021, Lesley was named to The National Trial Lawyers list of the Top 100 Civil Plaintiff Trial Lawyers in California for her superior skills and qualifications. In 2018, Lesley was honored as a "California Lawyer of the Year" ("CLAY") for her work in *In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation* and was recognized as a "Plaintiff Trailblazer" by the National Law Journal (2018). In 2017 and 2018, she was named a "Super Lawyer" in the field of Class Action & Mass Torts Attorneys.

In July 2018, Judge Chhabria of the Northern District of California appointed Lesley as co-lead counsel for plaintiffs in *In re Facebook, Inc. Consumer Privacy User Profile Litigation*. This high-profile case seeks redress for Facebook users in the U.S and U.K. whose content specifically marked private was shared with thousands of third parties with no oversight and for the purpose of creating revenue for Facebook only. The more than four-hundred-page complaint documents how Facebook violated consumer fraud and privacy laws in allowing hundreds of third party apps, including Cambridge Analytica, to bundle and sell Facebook users' private information without their knowledge or consent.

In June 2017, Judge Edward M. Chen appointed Lesley to the Plaintiffs' Steering Committee in *In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices, and Products Liability Litigation*. Lesley worked closely with technical experts in that matter to determine if proposed fixes to the subject vehicles inflict additional damages upon class members. In May 2019, Plaintiffs secured final approval of a settlement of \$307.5 million in cash as well as extended warranties.

In December 2017, Judge Charles R. Breyer appointed Lesley to the Plaintiffs' Steering Committee in *In re German Automotive Manufacturers Antitrust Litigation*. Consumers and suppliers allege that German automakers engaged in a 20-year

cartel—the single largest known automobile cartel in U.S. and European history—to suppress the development of technology in their automobiles.

In 2015, Judge Charles R. Breyer appointed Lesley to the Plaintiffs’ Steering Committee in *In re Volkswagen “Clean Diesel” Marketing, Sales Practices, and Products Liability Litigation*. Lesley’s leadership position in this litigation included spearheading the investigation that ultimately uncovered German auto supplier Robert Bosch GmbH’s significant role in multiple schemes to place software in vehicles purposely designed to evade emissions laws. Plaintiffs in the Volkswagen litigation have recovered approximately \$15 billion for class members and the environment, the largest automotive class action recovery ever.

She represents the Cities of Palo Alto and Richmond, California in a municipal subclass in *In re Lithium Ion Batteries Antitrust Litigation*. In *In re Automotive Parts Antitrust Litigation*, Lesley represented Oakland County, Michigan; Traverse City, Michigan; the Village of Northport, New York; Mecklenburg County, North Carolina; and Richmond, California in the case against manufacturers of wire harnesses that settled on a non-class basis far in excess of the entities’ actual damages.

Lesley recently represented the National Black Farmers’ Association (“NBFA”), pro bono, in challenging the terms of the proposed merger between BB&T and SunTrust Bank. In 2019, she testified on behalf of the NBFA at the joint public hearing held by the Federal Reserve Board and the Federal Deposit Insurance Corporation advocating for terms that will better serve small farmers. As a condition of securing merger approval from the Department of Justice, the banks have since agreed to sell off 28 branches in regions that BFA identified.

In addition, Lesley has extensive experience representing sophisticated institutional investors in landmark securities actions. Some of those cases include *In re Marsh & McLennan Cos., Inc. Securities Litigation* (\$400 million settlement); *In re Cavanaugh Securities Litigation* (including an appeal to the Ninth Circuit concerning the method of selecting lead plaintiff and lead counsel after the enactment of the Private Securities Litigation Reform Act (“PSLRA”)); *In re Cardinal Health Inc. Securities Litigation* (\$600 million settlement); and *In re Cisco Systems, Inc. Securities Litigation* (\$99 million settlement).

Lesley’s extensive trial experience has spanned her career. In October 2014, Lesley tried an internet privacy case against a Chinese-owned, California-based internet site, recovering 100 percent of economic damages and a \$15 million punitive damages jury verdict, as well as significant injunctive relief. Her first trial was in 1998 before the Honorable Vaughn Walker on behalf of Amanda Buritica, a U.S. citizen born in Colombia who was unlawfully detained by U.S. Customs at San Francisco International Airport; that case resulted in the largest verdict at the time under the Federal Tort Claims Act.

Lesley is committed to public service through volunteer efforts, and currently serves on the Advisory Council of the East Bay Community Law Center, as well as the Executive Committee of the Securities Section for the Bar Association of San Francisco. She is a past Co-Chair of the San Francisco LGBT Community Center, a past Co-Chair of Bay Area Lawyers for Individual Freedom, a past National Chair of the National Center for Lesbian Rights, and a past Vice President and Director of the Board of the Frameline Film Festival. She has previously served on the boards of Women Lawyers of Alameda County, Equality California, the International Gay and Lesbian Human Rights Commission, and the Alice B. Toklas Democratic Club. She also is a member of the National Association of Public Pension Attorneys (NAPPA).

Lesley serves on the drafting committee for the Sedona Conference Data Privacy Primer on Biometrics and is a frequent speaker on privacy-related topics. She is a recurring participant in the “Masters of Litigation” conference taught at West Virginia Law School, and has spoken at the Northern District of California Judicial Conference. She is an acting Lawyer Representative for the Northern District of California and an active member of the Executive Committees of the CyberSecurity, Privacy, and Securities committees for the Bar Association of San Francisco. She is also a co-author of the George Washington Law School’s Inclusivity and Excellence: Guidelines and Best Practices for Judges Appointing Lawyers to Leadership Positions in MDL and Class Action Litigation.

Lesley holds degrees from the University of Bonn (Germany) and Harvard College, and received a J.D. from the University of Virginia Law School (1997). She attended high school at Haderslev Katedralskole in Denmark. She speaks German and Danish, and is proficient in French.

Lesley is admitted to practice in California (1997), the U.S. Court of Appeals for the Ninth Circuit (1998), and the U.S. District Courts for the Northern District (1997) and the Eastern, Central, and Southern Districts of California (1998) and the Eastern District of Michigan (2019).

**JAVIER BLEICHMAR**  
*Partner*

New York

- Email: [jbleichmar@bfalaw.com](mailto:jbleichmar@bfalaw.com)
- Tel: +1 212 789 1341
- [www.bfalaw.com/professionals/javier-bleichmar](http://www.bfalaw.com/professionals/javier-bleichmar)

Javier Bleichmar leads BFA’s U.S. Case Evaluation and U.S. Securities Litigation teams. He brings a long career of litigation success to his prosecution of large-scale fraud class actions on behalf of investors. Javier has nearly two decades of experience and has been “recommended” in the field of securities litigation by The Legal 500.

Javier currently leads the BFA teams prosecuting class actions led by our clients against Teva Pharmaceutical Industries, Ltd., Citigroup, Inc., Granite Construction

Incorporated, and Align Technology, Inc. Javier is also leading a securities action against Allianz Global Investors U.S., L.L.C. on behalf of the Metropolitan Transportation Authority.

Javier previously led the team litigating *In re MF Global Holdings Limited Securities Litigation* on behalf of Her Majesty the Queen in Right of Alberta and MF Global investors, in connection with the company's dramatic collapse on October 31, 2011. Judge Marrero in the Southern District of New York sustained the complaint in its entirety, and plaintiffs secured settlements totaling over \$234 million, resolving claims against MF Global's former officers and directors, several underwriter defendants, and MF Global's outside auditor.

Javier also led the team that prosecuted *Freedman v. Weatherford International Ltd., et al.*, on behalf of the Anchorage Police & Fire Retirement System. The case alleged that Weatherford, which made three restatements of audited financials totaling approximately \$1 billion, misled investors about the Company's tax accounting. After more than three years of intense litigation, including 22 depositions and complex expert testimony, the parties announced a proposed \$120 million settlement on June 30, 2015.

Javier is also a successful appellate advocate, prevailing before the Eighth Circuit in *Public Pension Fund Group v. KV Pharmaceutical, Co.* The Eighth Circuit reversed an earlier dismissal and clarified the standard governing pharmaceutical companies' disclosures relating to FDA notifications.

Javier is active in educating international institutional investors on developing trends in the law, particularly the ability of international investors to participate in securities class actions outside the United States. Through these efforts, many of Javier's international clients were able to join the organization representing investors (i.e., the Foundation) in the first securities class action settlement under the then-recently enacted Dutch statute against Royal Dutch Shell. He has co-authored articles concerning the developments in the class action landscape in Australia, and also provides thought leadership as a regular contributor on securities issues in the New York Law Journal. He has co-authored "IndyMac Leaves Uncertain Landscape for Opt-Out Litigation" and "The Evolving Legacy of *Fait v. Regions Financial*." Javier is an active member of the National Association of Public Pension Plan Attorneys (NAPPA).

Prior to founding the firm, Javier was a Partner of Labaton Sucharow LLP. He also practiced at Bernstein Litowitz Berger & Grossmann LLP, where he was actively involved in the *In re Williams Securities Litigation*, which resulted in a \$311 million settlement, as well as significant securities matters involving Lucent Technologies, Inc., Consecro, Inc. and Biovail Corp. He began his legal career at Kirkland & Ellis LLP.



Javier earned a B.A. from the University of Pennsylvania and a J.D. from Columbia University School of Law (1998), where he was a Harlan Fiske Stone Scholar. During law school, he served as a law clerk to the Honorable Denny Chin, U.S. District Court Judge for the Southern District of New York. Javier is a native Spanish speaker and fluent in French.

Javier is admitted to practice in New York (1998), the U.S. Supreme Court (2010), and the U.S. Courts of Appeals for the Second Circuit (2010), Eight Circuit (2010), Ninth Circuit (2010), Tenth Circuit (2013), and Eleventh Circuit (2011). He is also admitted in the U.S. District Courts for the Southern and Eastern Districts of New York (1999).

**JOSEPH A. FONTI**  
*Partner*

New York

- Email : [jfonti@bfalaw.com](mailto:jfonti@bfalaw.com)
- Tel: +1 212 789 1342
- [www.bfalaw.com/professionals/joseph-fonti](http://www.bfalaw.com/professionals/joseph-fonti)

Joseph A. Fonti leads the Firm's U.S. Securities Litigation team. He has nearly twenty years of experience in prosecuting complex litigations on behalf of institutional investors. His commitment to clients, advocacy skills, and litigation results have resulted in Joseph being "recommended" in the field of securities litigation by the Legal 500.

Joseph currently leads the BFA teams prosecuting class actions led by our clients against Teva Pharmaceutical Industries, Ltd. and Citigroup, Inc.

Joseph previously served as co-lead counsel in *In re Genworth Financial Inc. Securities Litigation* in the Eastern District of Virginia – widely known as the "rocket docket." Joseph led the litigation to a remarkable recovery for the class in the amount of \$219 million, the largest securities class action recovery ever achieved in that jurisdiction. In defeating defendants' motion to dismiss, Joseph secured one of the first pro-investor opinions after the Supreme Court's recent decision in the Omnicare matter. Joseph already had notable success in the high-pressure environment of the E.D. Va. In 2013, as lead trial lawyer on behalf of shareholders of Computer Science Corp., after prevailing at class certification and only four weeks before trial in the CSC matter, Joseph and his team secured a \$97.5 million settlement – the second-largest cash securities settlement in the court's history.

Joseph also contributed to the prosecution and ultimate resolution of the Weatherford securities litigation (*Freedman v. Weatherford International Ltd., et al.*). Joseph's contribution to this very intense litigation centered on complex accounting and expert matters, and he took trial testimony of several third-party accountants and consultants who were not expected to appear for trial. Joseph, as part of the team led by partner Javier Bleichmar, contributed to an outstanding recovery of \$120 million for Weatherford shareholders.

With over a dozen years of experience in investor litigation, Joseph's career is also marked by significant successes in the area of auditor liability and stock options backdating. For example, he represented shareholders in the \$671 million recovery in *In re HealthSouth Securities Litigation*. Particularly, Joseph played a significant role in recovering \$109 million from HealthSouth's outside auditor Ernst & Young LLP, one of the largest recoveries to date against an auditing firm. He also contributed to securing a \$173.5 million settlement in *In re Broadcom Corp. Securities Litigation*, which, at the time, was the second-largest cash settlement involving a company accused of options backdating. This was the only such case in which claims against the auditors were sustained.

In addition to representing several of the most significant U.S. institutional investors, Joseph has represented a number of Canada's most significant pension systems and asset managers. He also provides thought leadership on issues of particular relevance to these clients. For example, he co-authored "Cross-Listed Securities Cases Present Challenges," for the National Law Journal, (May 30, 2016), which addresses recent Morrison interpretations in light of modern financial markets. He also led the prosecution of *In re NovaGold Resources Inc. Securities Litigation*, which resulted in the largest settlement under Canada's securities class action laws.

Additionally, Joseph has achieved notable success as an appellate advocate. He successfully argued before the Second Circuit Court of Appeals in *In re Celestica Inc. Securities Litigation*. The Second Circuit reversed an earlier dismissal and turned the tide of recent decisions by realigning pleading standards in favor of investors. Joseph was also instrumental in the advocacy before the Ninth Circuit Court of Appeals in *In re Broadcom Corp. Securities Litigation*. This appellate victory marked the first occasion a court sustained allegations against an outside auditor related to options backdating.

Prior to founding the firm, Joseph was a Partner of Labaton Sucharow LLP. He also practiced securities litigation at Bernstein Litowitz Berger & Grossmann LLP, and began his legal career at Sullivan & Cromwell LLP, where he represented Fortune 100 corporations and financial institutions in complex securities litigation, in multifaceted SEC investigations, and at trial.

Joseph is a member of the ABA, the NY State Bar Association, the Bar of the City of New York, and the National Association of Public Pension Attorneys (NAPPA).

Joseph earned a B.A., cum laude, from New York University and a J.D. from New York University School of Law (1999), where he was a member of the Marden Moot Court. He is admitted to practice in New York (2000), the U.S. Supreme Court (2007), and the U.S. Courts of Appeals for the Second Circuit (2010), Ninth Circuit (2007), and Tenth Circuit (2013). He also is admitted in the U.S. District Courts for the Southern and Eastern Districts of New York (2001).



**DOMINIC J. AULD**  
*Partner*

Toronto

- Email: [dauld@bfalaw.com](mailto:dauld@bfalaw.com)
- Tel: +1 212 789 1344
- [www.bfalaw.com/professionals/dominic-auld](http://www.bfalaw.com/professionals/dominic-auld)

Dominic J. Auld leads BFA's Non-U.S. Litigation team. He has more than a decade of experience in representing and advising institutional clients in large-scale securities and investment-related lawsuits. Dominic has been named a "Super Lawyer" in the field of securities litigation by *Super Lawyer* awards and has been "recommended" in the field of securities litigation by *The Legal 500*.

Dominic is responsible for BFA's outreach to pension systems, asset managers, and sovereign wealth funds outside the United States – regularly advising clients in Europe, Australia, Asia, and across his home country of Canada.

Dominic and his team have served as liaison counsel to global investors in many shareholder and investor litigations outside the United States, including class and collective actions against Olympus Corp. (Japan); OZ Minerals Ltd. (Australia); Fortis (Belgium and the Netherlands); Vivendi Universal (France); and Volkswagen AG (Germany), and many other companies.

Dominic is sought after as a commentator on topics such as corporate governance, shareholder activism, fiduciary duty, corporate misconduct, and international class and collective litigation. He has been a regular speaker and panelist at law and investment conferences, including past events such as the Canadian Foundation for Advancement of Investor Rights (FAIR Canada) and Osgoode Hall Law School conference on public and private securities enforcement and investor recovery in Toronto, the IMF Bentham shareholder class action conference in Sydney, and the Annual International Bar Association meeting in Dubai.

Dominic is the author of various articles of interest to the Firm's client base, including an analysis of shareholder remedies in Japan in *Law360*, and a piece regarding custodian bank fees and their impact on pension funds globally in *Nordic Regions Pensions and Investment News* magazine. He is quoted in publications including *The Economist*, *The Financial Times*, *The New York Times*, *USA Today*, *The Times of London*, *The Evening Standard*, *The Guardian*, and *The Daily Mail*, and trade publications such as *Global Pensions*, *OP Risk and Regulation*, *The Lawyer*, *Investments and Pensions Europe*, *Professional Pensions*, and *Benefits Canada*. He also was interviewed by *Corporate Counsel* for a feature article on rogue trading.

Prior to founding the Firm, Dominic was a Partner of Labaton Sucharow LLP. He also practiced securities litigation at Bernstein Litowitz Berger & Grossmann LLP, where he began his career as a member of the team responsible for prosecuting the landmark action *In re WorldCom Inc. Securities Litigation*, which resulted in a settlement of more than \$6 billion.

Dominic has years of experience working directly with institutional clients affected by securities fraud. For example, he worked extensively with the Ontario Teachers' Pension Plan Board as it led securities actions *In re Nortel Networks Corp. Securities Litigation*, *In re Williams Securities Litigation*, and *In re Biovail Corp. Securities Litigation* – cases that recovered a total of more than \$1.7 billion for investors.

Dominic earned a B.A. from Queen's University in Canada and a J.D. from Lewis and Clark Law School (1998). He is admitted to practice in New York (1998), and in the U.S. District Courts for the Southern and Eastern Districts of New York (2011).

Nancy A. Kulesa  
Partner

New York

- Email: [nkulesa@bfalaw.com](mailto:nkulesa@bfalaw.com)
- Tel: +1 212 789 1343
- [www.bfalaw.com/nancy-kulesa](http://www.bfalaw.com/nancy-kulesa)

Nancy Kulesa has extensive experience in complex litigation in federal and state courts, including securities litigation, Employee Retirement Income Security Act of 1974 (ERISA) litigation, consumer fraud litigation, mergers and acquisitions cases, and antitrust litigation.

Nancy represents public pension funds, Taft-Hartley funds, and other institutional investors in securities class actions and derivative litigation. She has nearly two decades of experience assisting clients in identifying material losses in their securities portfolios caused by corporate wrongdoing. Nancy consults with institutional investors to help them monitor litigation and to evaluate opportunities for recovery.

Nancy is currently litigating the class action against Align Technology Inc. on behalf of Court-appointed Lead Plaintiff Macomb County Employee's Retirement System. Nancy is also litigating an action against certain members of the current and former board of directors of Tesla on behalf of the Police & Fire Retirement System of City of Detroit, and is pursuing confidential derivative actions on behalf of additional institutional clients. Nancy has previously been counsel in numerous high-profile securities fraud litigations that have recovered hundreds of millions of dollars for shareholders including:

- *In re CIT Group Securities Litigation*, 1:08-06613 (S.D.N.Y.) (\$75 million)
- *Klugmann v. American Capital Ltd.*, 09-cv-0005 (D. Md.) (\$18 million)
- *In re Nuvelo, Inc. Securities Litigation*, 07-cv-4056 (N.D. Cal.) (\$8.9 million)
- *Bauer v. Prudential, Inc.*, 09-cv-1120 (JLL) (D. NJ) (\$16.5 million)
- *Carlson v. Xerox Corporation*, 3:00CV01621 (ATW) (D Conn) (\$750 million)
- *Fragala v. 500.com Ltd.*, 2:15-cv-01463-MMM (C.D. Cal.) (\$2.5 million)

Nancy represented a Taft-Hartley Fund in the historic settlement with Twenty-First Century Fox, Inc. regarding allegations surrounding workplace harassment incidents at Fox News, which resulted in a \$90 million derivative settlement and wide-ranging corporate governance reforms at the company.

Nancy has also represented consumers in complex, class action litigation involving false advertising and defective product claims, including serving as court-appointed Lead Counsel in *Logan Landes, et al, v. Sony Mobile Communications, et al*, 17-cv-02264-JFB-SIL (EDNY), which resulted in settlement relief to consumers valued at over \$6 million. In that litigation, the Honorable Joseph F. Bianco recognized the high quality of her work, "The quality of the representation, as I noted, has been extremely high, not just in terms of the favorable outcome in terms of the substance of the settlement, but in terms of the diligence and the hard work that has gone into producing that outcome."

Prior to joining BFA, Nancy was a partner at a well-established national securities litigation firm where she represented investors in securities class actions and created and directed the firm's Portfolio Monitoring Services practice. Nancy has experience in representing corporations seeking antitrust clearance of mergers and acquisitions and has also handled commercial litigation matters and contractual disputes.

Nancy frequently speaks on topics related to securities litigation and investor rights at educational forums for public pension funds and Taft-Hartley funds.

She is a member of the National Conference on Public Employee Retirement Systems ("NCPERS"), International Foundation of Employee Benefit Plans (IFEBC), Texas Association of Public Employee Retirement Systems (TEXPERS), Florida Public Pensions Trustees Association (FPPTA), Michigan Association of Public Employee Retirement Systems (MAPERS) and Illinois Public Pension Fund Association (IPFFA). Nancy serves as an Officer to the National Association of Shareholder & Consumer Attorneys (NASCA) as Treasurer.

Nancy was recognized by Lawdragon as a Leading Plaintiff Financial Lawyer.

Nancy earned a B.A. in International Politics from Fordham University in 1998 and a J.D. from the University of Connecticut School of Law in 2001.

Nancy is admitted to practice in Connecticut (2001), the United States District Court for the District of Connecticut (2004), the United States District Court for the Southern District of New York (2015), and the United States Court of Appeals for the Ninth Circuit (2016).

ERIN WOODS  
*Partner*

New York

- Email: [ewoods@bfalaw.com](mailto:ewoods@bfalaw.com)
- Tel: +1 212 789 1353
- [www.bfalaw.com/professionals/erin-woods](http://www.bfalaw.com/professionals/erin-woods)

As Co-Director of Institutional Investor Relations and the head of BFA's Claims Filing Team, Erin Wood's practice combines her vast experience advising institutional investors on current and potential securities litigation and advising clients in recovering investment losses through filing settlement claims.

With more than twelve years in the class action industry, Erin brings a unique blend of seasoned litigator, a decade of representation of institutional investors, and expertise in the claims administration process. Erin is currently a member of the team prosecuting the securities class action against Citigroup, Inc. She also leads institutional investor outreach and advises pension funds and other entities on lawsuits concerning violations of U.S. and non-U.S. securities and investment laws, antitrust and consumer laws, and securities class action settlements.

Prior to joining BFA, Erin was a Director at an industry-leading claims administration firm, where she provided plaintiffs' and defense counsel comprehensive, accurate, and practical approaches to class action and mass tort settlement administration.

While working with BFA's founding partners as an associate at their prior firm, Erin litigated securities class actions such as *In re Celestica Inc. Securities Litigation* and *In re NovaGold Resources Inc. Securities Litigation*, which resulted in a cross-border settlement that was at the time the largest settlement under Canada's securities class action laws, and two related cases against OppenheimerFunds Inc. that resulted in a \$100 million settlement.

Erin is a member of the National Association of Public Pension Attorneys (NAPPA), National Conference of Public Employee Retirement Systems (NCPERS), National Council on Teacher Retirement (NCTR), National Association of State Retirement Administrators (NASRA), State Association of County Retirement Systems (SACRS), California Association of Public Retirement Systems (CALAPRS), and a number of additional organizations.

Erin earned a B.A. from Villanova University in 2004 and a J.D. from Brooklyn Law School in 2008. She is admitted to practice in New York (2009), the U.S. Courts of Appeals for the Ninth Circuit (2010) and Second Circuit (2011), and the U.S. District Court for the Southern District of New York (2009).

ANNE DAVIS  
Partner

Oakland

- Email: [adavis@bfalaw.com](mailto:adavis@bfalaw.com)
- Tel: +1 415 445 4016
- [www.bfalaw.com/professionals/anne-davis](http://www.bfalaw.com/professionals/anne-davis)

Anne Davis joined BFA in 2018. She has a decade of experience litigating complex matters in both federal and state courts, including the courts of California, Delaware, and Kansas. She focuses her practice on complex investigations and litigation of antitrust, consumer, and securities matters.

Anne plays a key role in litigating *In re: Facebook, Inc. Consumer Privacy User Profile Litigation*; she is also a member of the BFA teams litigating *In re German Automotive Manufacturers Antitrust Litigation* and *In re Domestic Airlines Travel Antitrust Litigation*. She recently co-authored *That's The Ticket – Game On For Plaintiffs Challenging Suppression of the Market For Football Broadcasts* for the September edition of the Antitrust, UCL and Privacy Section E-Brief for California Lawyer's Association, and *The Interplay of the European Union's General Data Protection Regulation and U.S. E-Discovery—One Year Later, the View Remains the Same*, which was published in the Spring 2019 edition of *Competition*.

Prior to joining BFA, Anne served as a Principal Counsel for Sales Practice Enforcement at the Financial Industry Regulatory (FINRA), where she, as appropriate, brought charges and negotiated resolutions or litigated formal actions pertaining to violations of FINRA, U.S. Securities and Exchange Commission (SEC), and Municipal Securities Rulemaking Board (MSRB) rules, and the federal securities laws by registered individuals and FINRA member firms.

Before FINRA, she was a senior associate at Morrison & Foerster, LLP, where she specialized in securities litigation and enforcement, complex civil litigation, and internal investigations. She also maintained a pro bono practice involving Title IX compliance in California public schools, litigation on behalf of prisoners asserting Section 1983 excessive force claims, and asylum claims.

Anne earned a B.A. with honors from DePaul University (2002), a M.A. (Political Science) from the University of Michigan (2006), and a J.D. from the University of Michigan Law School (2008). She is admitted to practice in California (2009), and the U.S. District Courts for the Northern (2010), Central (2011) and Eastern (2014) Districts of California and the Eastern District of Michigan (2019).

**EVAN KUBOTA**  
*Partner*

New York

- Email: [ekubota@bfalaw.com](mailto:ekubota@bfalaw.com)
- Tel: +1 212 789 1347
- [www.bfalaw.com/professionals/evan-kubota](http://www.bfalaw.com/professionals/evan-kubota)

Evan Kubota brings substantial experience in all stages of litigation, from pre-suit investigation and strategic advice through motion practice, discovery, trial, and appeal. His experience includes complex securities and derivative actions, bankruptcy confirmation and adversary proceedings, and regulatory investigations. He has taken and defended numerous depositions, worked closely with damages and industry experts, and participated in several trials.

Evan is currently a member of the team prosecuting the cases against Teva Pharmaceutical Industries, Ltd. and Granite Construction Incorporated.

Prior to joining BFA in 2019, Evan was an associate at Paul, Weiss, Rifkind, Wharton & Garrison LLP for nine years, where he litigated high-profile matters on behalf of financial institutions and issuers in a variety of industries. Representative matters include plaintiff's counsel in breach of contract, fraud and civil RICO litigations against a distressed insurance company; debtor's counsel in a leading media company's Chapter 11 bankruptcy, which eliminated over \$1 billion in debt; and the defense of numerous RMBS-related litigations, arbitrations, and investigations in the wake of the financial crisis.

Evan earned a B.A. from the University of Florida, *cum laude*, in 2007 and a J.D. from Harvard Law School, *cum laude*, in 2010. He is admitted to practice in New York (2011), as well as the U.S. District Courts for the Southern and Eastern Districts of New York (2011).

**MATTHEW MELAMED**  
*Partner*

Oakland

- Email: [mmelamed@bfalaw.com](mailto:mmelamed@bfalaw.com)
- Tel: +1 415 445 5601
- [www.bfalaw.com/professionals/Matthew-Melamed](http://www.bfalaw.com/professionals/Matthew-Melamed)

Matthew Melamed joined the firm in 2021, focusing on prosecuting complex consumer and antitrust matters.

Before joining the firm, Matt was a partner at Robbins Geller Rudman & Dowd LLP, where he represented cities, counties, and states in nationwide litigation concerning the marketing, distribution, and dispensing of prescription opioids. Among other roles in those cases, he represented the City and County of San Francisco, whose case was remanded as an MDL bellwether from *In re: National Opiate Litigation*. Matt also litigated numerous securities fraud lawsuits, including *Jones v. Pfizer Inc.*, *In re St. Jude Medical, Inc. Securities Litigation*, and *Villella v. Chemical & Mining Company of Chile, Inc.* He was a member of case teams that recovered more than \$1.2 billion.



Matt was previously a law clerk for the Honorable Joseph A. Greenaway, Jr. on both the United States District Court for the District of New Jersey and the United States Court of Appeals for the Third Circuit. He was also the Kazan-Wallace Attorney at Public Justice PC. During law school, Matt was an extern for the Honorable Susan Y. Illston, United States District Court for the Northern District of California.

Matt is admitted to practice in California (2008), the United States Courts of Appeals for the Third (2010) and Tenth (2009) Circuits, and the United States District Courts for the Northern (2010) and Central (2012) Districts of California.

**ROSS SHIKOWITZ**  
*Partner*

New York

- Email: [rshikowitz@bfalaw.com](mailto:rshikowitz@bfalaw.com)
- Tel: +1 212 789 1349
- [www.bfalaw.com/professionals/ross-shikowitz](http://www.bfalaw.com/professionals/ross-shikowitz)

For over a decade, Ross Shikowitz has been advising many of the world's largest and most sophisticated institutional investors concerning their rights and potential legal claims arising out of securities-related matters. He is a senior member of the firm's Client Monitoring and Case Evaluation Group in which he, together with a team of attorneys and financial analysts, develops and recommends legal strategies to the firm's clients.

Ross is also one of the lead attorneys litigating the securities class action against Granite Construction Incorporated, which the court sustained over defendants' motion to dismiss and recently certified as a class action. Ross is also one of the lead attorneys representing investors in the securities class actions concerning Citigroup Inc. and Align Technology, Inc. For his success representing investors, Ross has consistently been named by Super Lawyers as a New York "Rising Star" in the area of securities litigation.

Prior to joining the firm, Ross was an associate at Bernstein Litowitz Berger & Grossmann LLP where he was a senior member of its New Matter Department. Ross was also an instrumental member of the litigation teams responsible for recovering hundreds of millions of dollars on behalf of injured investors that were misled when purchasing residential mortgage-backed securities. He also served as a member of the litigation team prosecuting the securities fraud class action against Volkswagen, which resulted in a recovery of \$48 million for investors in Volkswagen American Depositary Receipts. Ross also served as a member of the team litigating the securities class action concerning GT Advanced Technologies, which has resulted in \$36.7 million in recoveries to-date.

Ross earned a B.A., *cum laude*, from Skidmore College, and an M.A. from Indiana University-Bloomington. He earned a J.D., *cum laude*, from Brooklyn Law School (2010) where he worked as a research assistant to Brooklyn Law School Professor of

Law Emeritus Norman Poser, a widely respected expert in international and domestic securities regulation. He also served as a judicial intern to the Honorable Brian M. Cogan of the Eastern District of New York, a legal intern for the Major Narcotics Investigations Bureau of the Kings County District Attorney's Office, and a summer associate at a prominent defense firm.

Ross is admitted to practice in New York (2011), the U.S. District Courts for the Southern District of New York (2011) and the Eastern District of New York (2011).

**KENDRA SCHRAMM**  
*Of Counsel*

New York

- Email: [kschramm@bfalaw.com](mailto:kschramm@bfalaw.com)
- Tel: +1 212 789 1358
- [www.bfalaw.com/professionals/kendra-schramm](http://www.bfalaw.com/professionals/kendra-schramm)

Kendra Schramm is a highly valued litigator with over ten years of experience prosecuting complex securities class actions. Kendra is a key member of the Firm's Non-U.S. Litigation and Claims Filing teams. She also assists the Client Reporting and Data Analysis team in assessing clients' loss exposure in both domestic and international matters.

Kendra acts as liaison counsel to institutional investors in securities and investment-related actions across the globe – including in Australia, Europe, and Japan. She provides highly pragmatic advice to sophisticated clients on the risks of participation in these cases, which often require a formal decision to pursue a claim. She is instrumental to BFA's outreach to institutional clients outside the United States. In addition, Kendra recently co-authored "A Look at Shareholder Remedies in Japan" in *Law360*, commenting on the evolving Japanese litigation regime.

Prior to joining the Firm, Kendra was an associate at Labaton Sucharow LLP, where she was a member of the team that recovered more than \$1 billion in total settlements in the landmark securities class action against American International Group and numerous related defendants. She also was instrumental in prosecuting the complex securities litigation against the Federal National Mortgage Association (Fannie Mae), which successfully alleged that investors' losses were caused by the defendants' misstatements and misconduct, rather than the recent financial crisis, and recovered \$170 million.

Kendra earned a B.A. from New York University and a J.D. from Brooklyn Law School (2011), where she was an Associate Managing Editor of the *Journal of Law & Policy*. During law school, she served as a law clerk to the Honorable Elizabeth S. Stong, U.S. Bankruptcy Court Judge for the Eastern District of New York. She is admitted to practice in New York (2012), New Jersey (2012), the U.S. Supreme Court (2014), and the U.S. District Courts for the Southern District of New York (2012) and the District of New Jersey (2012).



**SARA SIMNOWITZ**  
*Special Counsel*

New York

- Email: [ssimnowitz@bfalaw.com](mailto:ssimnowitz@bfalaw.com)
- Tel: +1 212 789 2309
- [www.bfalaw.com/sara-simnowitz](http://www.bfalaw.com/sara-simnowitz)

Sara Pildis Simnowitz is Special Counsel at BFA, prosecuting a variety of complex litigations.

Sara Simnowitz has nearly twenty years of experience in all aspects of litigating complex matters. Sara is dedicated to prosecuting securities, antitrust, and consumer fraud class actions on behalf of institutional, municipal, and individual clients. Sara draws on her extensive litigation experience while playing a key role in prosecuting the Firm's antitrust and consumer cases, including *In re: Facebook, Inc. Consumer Privacy User Profile Litigation*.

Sara is also a central member of the team prosecuting *Ontario Teachers' Pension Plan Board, et al. v. Teva Pharmaceutical Industries Ltd. et al.*, and prosecuted *In re Genworth Financial Securities Litigation* on behalf of Her Majesty the Queen in Right of Alberta in the Eastern District of Virginia.

Before joining BFA, Ms. Simnowitz was a senior associate at Arnold & Porter LLP, where she focused on complex commercial litigation. She previously practiced at Heller Ehrman LLP in New York and Foley Hoag LLP in Massachusetts, where she focused on complex commercial and securities litigation.

Sara earned a B.A., *summa cum laude*, from Brandeis University, a J.D. from the University of Chicago Law School (2001), and an M.A. from the London School of Economics and Political Science (2002). She is admitted to practice in Massachusetts (2002), New York (2006), the U.S. Supreme Court (2008), the U.S. Court of Appeals for the First Circuit (2003), and the U.S. District Courts for the District of Massachusetts (2002), the Southern and Eastern Districts of New York (2006), and the Western District of New York (2008).

**GEORGE BAUER**  
*Associate*

New York

- Email: [gbauer@bfalaw.com](mailto:gbauer@bfalaw.com)
- [www.bfalaw.com/professionals/george-bauer](http://www.bfalaw.com/professionals/george-bauer)

For almost nine years, George Bauer has taken a lead role in all stages of complex civil litigation, from pre-suit investigation through motion practice, discovery, summary judgment, and trial.

George is currently a member of the teams prosecuting cases against Granite Construction Incorporated and Allianz Global Investors U.S., L.L.C.

While an associate and later junior partner at the international law firm of Kirkland & Ellis LLP, George gained experience taking and defending depositions, working with expert consultants and witnesses, and appearing in court. In addition, George has handled numerous internal investigations and investigations by both the U.S. Department of Justice and the U.S. Securities and Exchange Commission. George has represented clients in connection with complex regulatory enforcement matters dealing with, among other things, securities fraud, commodities fraud, and foreign bribery issues. He has also advised transactional teams on litigation and compliance related risks.

Prior to Kirkland, George attended Brooklyn Law School where he served as a student prosecutor in the Kings County District Attorney's office and led the prosecution of misdemeanor domestic violence cases. He also interned at the New York City Police Department, the U.S. Attorney's Office for the Eastern District of New York, the Federal Trade Commission, and the New York Attorney General's Office.

George earned a B.A. from the University of Massachusetts at Amherst, *cum laude*, in 2008 and a J.D. from Brooklyn Law School, *magna cum laude*, in 2011. He is admitted to practice in New York (2012), the Eastern District of New York (2013), and the Southern District of New York (2014).

**ANGELICA ORNELAS**  
*Associate*

**Oakland**

- Email: [aornelas@bfalaw.com](mailto:aornelas@bfalaw.com)
- Tel: +1 415 445 4011
- [www.bfalaw.com/professionals/angelica-ornelas](http://www.bfalaw.com/professionals/angelica-ornelas)

Angelica Ornelas has substantial experience litigating class actions and other complex matters in federal courts across the country. Prior to joining BFA, Angelica was an associate at Girard Sharp, where she specialized in consumer protection and financial products litigation. While at Girard Sharp, Angelica served as co-class counsel in *Prather v. Wells Fargo Bank, N.A.*, representing individuals who received illegal automated calls or text messages from the bank. Angelica was also a member of the litigation team in *Daccache v. Raymond James Financial, Inc.*, brought on behalf of victims of the Jay Peak investment fraud—the largest in the history of the EB-5 visa program—and *Larson v. John Hancock Life Insurance Company (U.S.A.)*, a certified class action alleging that John Hancock improperly inflated cost of insurance charges deducted from its customers' life insurance policies.

Before Girard Sharp, Angelica was a Fellow at the California Monitor Program, a program of the California Attorney General, where she worked closely with Congresswoman Katie Porter to ensure that the nation's five largest mortgage servicers delivered the relief Vice President Kamala Harris negotiated for Californians as part of the landmark \$25 billion National Mortgage Settlement.

Angelica earned an undergraduate degree from UC Los Angeles and completed a master's program at San José State University before receiving her law degree from UC Berkeley. After law school, she clerked for the United States District Court for the Northern District of California and the United States Bankruptcy Court for the District of Nevada.

Angelica is an active member of the Sedona Conference, Working Group 1 on Electronic Document Retention and Production. A frequent speaker on electronic discovery issues, she recently participated in a panel hosted by e-discovery service provider Driven, Inc. entitled "Safeguarding the Attorney-Client Privilege in Discovery." Last November, she presented at Georgetown Law's Advanced Electronic Discovery Institute on topics involving collection, review, and production of electronically stored information during the COVID-19 pandemic. She was also featured as a panelist at the 2019 California Employment Lawyers Association's Electronic Discovery Seminar.

Angelica is also a member of the Federal Bar Association, was selected as "Top 40 Under 40 Civil Plaintiff Trial Lawyers in California" by The National Trial Lawyers for 2021, and has been selected as a Northern California Rising Star every year since 2017.

**BENJAMIN F. BURRY**  
*Associate*

New York

- Email: [bburry@bfalaw.com](mailto:bburry@bfalaw.com)
- Tel: +1 212 789 1345
- [www.bfalaw.com/professionals/benjamin-burry](http://www.bfalaw.com/professionals/benjamin-burry)

Benjamin Burry has substantial experience representing clients in a broad range of complex commercial and statutory litigation matters, including in contract and investment disputes, intellectual property disputes, actions involving a wide array of business torts, fraud, breach of fiduciary duty, securities class actions, shareholder derivative litigation, and bankruptcy litigation, as well as cases involving the Federal Arbitration Act. He has represented clients in federal and state courts throughout the United States, including bankruptcy court, as well as arbitration forums, private mediation, and in enforcement proceedings.

At BFA, Benjamin is a member of the teams prosecuting cases against Teva Pharmaceutical Industries, Ltd. and Granite Construction, Inc.

Benjamin also maintains an active pro bono practice, including representing New York City parks and community gardens in civil litigation as well as in corporate governance issues, land rights, local law and regulations, licensing and leases.

Prior to joining BFA, Benjamin was a senior associate at Sidley Austin LLP, where he was a member of the firm's securities and shareholder litigation, commercial litigation and disputes, and Supreme Court and appellate practices.

Benjamin earned a B.A., *magna cum laude*, from Illinois Wesleyan University in 2007 and a J.D. from the University of Chicago Law School in 2010. Benjamin is admitted to practice in the U.S. Court of Appeals for the Second Circuit (2014) and the U.S. District Courts for the Southern and Eastern Districts of New York (2013). After earning his law degree, Benjamin served as law clerk to the Honorable Susan P. Read of the New York Court of Appeals.

**THAYNE STODDARD**  
*Associate*

New York

- Email: [tstoddard@bfalaw.com](mailto:tstoddard@bfalaw.com)
- Tel: +1 212 789 1355
- [www.bfalaw.com/professionals/thayne-stoddard](http://www.bfalaw.com/professionals/thayne-stoddard)

Thayne Stoddard is a capable litigator with experience in all aspects of litigation, including investigating and drafting claims, briefing dispositive and other motions, coordinating discovery efforts, and preparing for and attending trial.

At BFA, Thayne primarily prosecutes complex securities fraud cases on behalf of institutional investors, and is a member of the teams prosecuting cases against Teva Pharmaceutical Industries, Ltd. and Citigroup, Inc.

Prior to joining BFA, Thayne was an associate at Kirkland & Ellis LLP for over three years and represented clients in numerous securities class action, complex commercial, shareholder, and bankruptcy cases.

Thayne earned a B.A. from Yale University in 2011, a J.D. from Duke University School of Law in 2014, and a M.A. from Duke University in 2014. Thayne is admitted to practice in New York (2015) and the U.S. District Court for the Southern District of New York (2016).

**NICHOLAS DENNANY**  
*Associate*

New York

- Email: [ndennany@bfalaw.com](mailto:ndennany@bfalaw.com)
- Tel: +1 212 789 1354
- [www.bfalaw.com/nicholas-dennany](http://www.bfalaw.com/nicholas-dennany)

Nicholas Dennany focuses his practice on investigating and analyzing pending and potential securities fraud and derivative claims and assists the Firm advise and recommend strategies to its clients to ensure that their rights are protected. Nick is also a member of the Firm's litigation team and has more than a decade of litigation experience, with specific expertise in discovery matters and managing large-scale electronic document reviews.

Nick was a member of the team that prosecuted *Genworth Financial* in the notoriously fast-paced jurisdiction of the Eastern District of Virginia. The case alleged that the defendants misled investors about the true state of the company's deteriorating long-term care business. BFA recovered \$219 million for investors – the largest ever class action settlement in Virginia.

Nick was also a key contributor to the Firm's recent success in *MF Global*, in connection with the company's dramatic collapse on October 31, 2011. The plaintiffs secured several settlements totaling more than \$234 million, resolving claims against MF Global's former officers and directors, several underwriter defendants, and MF Global's outside auditor.

Prior to joining the Firm, Nick worked with many of the attorneys now at BFA while at Labaton Sucharow LLP, where he was a member of the team that successfully prosecuted securities claims *In re Broadcom Corp. Securities Litigation* (\$173.5 million settlement) and *In re NovaGold Resources Inc. Securities Litigation* (\$26.6 million settlement).

Nick earned a B.A., *cum laude*, from the University of Florida and a J.D. from the University of Florida, Levin College of Law (2004). He is admitted to practice in New York (2006).

**JOSHUA SAMRA**  
*Associate*

Oakland

- Email: [jsamra@bfalaw.com](mailto:jsamra@bfalaw.com)
- Tel: +1 415 445 4017
- [www.bfalaw.com/professionals/joshua-samra](http://www.bfalaw.com/professionals/joshua-samra)

Joshua Samra is an associate in the Firm's Antitrust and Consumer practice group. Josh currently plays a significant role in the *In re: Facebook, Inc. Consumer Privacy User Profile Litigation*.

Prior to joining BFA, Josh was a Deputy District Attorney in Contra Costa County. As a Deputy District Attorney, Josh oversaw all parts of criminal prosecutions, including filing complaints, preparing and arguing motions, interviewing witnesses, trying cases before a jury, and litigating post-trial appeals. During his time in the District Attorney's office, Josh prosecuted ten jury trials to verdict.

Josh earned his B.A. from the University of California Berkeley (2013) and his J.D. from the University of California Los Angeles (2016), where he served as an Associate Editor for the UCLA Law Review. Josh is admitted to practice in California (2016) and the U.S. District Courts for the Northern (2019) and Central (2019) Districts of California and for the Eastern District of Michigan (2019).

**MATHEW HOUGH**  
*Associate*

New York

- Email: [mhough@bfalaw.com](mailto:mhough@bfalaw.com)
- [www.bfalaw.com/professionals/mathew-hough](http://www.bfalaw.com/professionals/mathew-hough)

Mathew Hough's practice focuses on securities litigation, corporate governance, and shareholder rights litigation. Mathew is skilled in all aspects of litigation, including

investigating potential securities fraud claims, briefing dispositive motions, and coordinating discovery efforts.

Matt is currently a member of the team prosecuting the securities class action against Teva Pharmaceutical Industries, Ltd.

Prior to joining the Firm, Mathew was an associate at a prominent plaintiffs' securities class action law firm, where he counseled institutional investors on potential legal claims as part of a team of attorneys, financial analysts, and investigators. Mathew was also previously an associate at Sullivan & Cromwell LLP where he worked extensively on complex commercial litigation, securities litigation, enforcement, and internal investigations.

Mathew earned a B.A. from Washington State University in 2012, and a J.D., *magna cum laude*, from Boston University School of Law in 2017. Mathew is admitted to practice in New York (2018).

**FREDERICK WILLIAM GREEN**  
Associate

New York

- Email: [wgreen@bfalaw.com](mailto:wgreen@bfalaw.com)
- Tel: +1 212 789 1348
- [www.bfalaw.com/professionals/frederick-green](http://www.bfalaw.com/professionals/frederick-green)

Frederick William Green ("Will") joined the firm in 2014 and is currently a Senior Projects Associate who assists with a number of the firm's securities litigation cases.

Will previously contributed to the Firm's discovery efforts in *In re Genworth Financial Inc. Securities Litigation*, managing the staff attorney discovery team from inception to settlement. The case alleged that Genworth, the largest seller of long-term care insurance in the U.S., misled investors about the true state of its deteriorating long-term care business. On May 1, 2015, U.S. District Judge James R. Spencer denied defendants' motion to dismiss. The parties reached a settlement of \$219 million, establishing a record for securities litigations in the Eastern District of Virginia.

Previously, Will contributed to the Firm's discovery efforts in the securities litigation against Weatherford International Ltd. on behalf of the Anchorage Police & Fire Retirement System (*Freedman v. Weatherford International Ltd., et al.*). The case alleged that Weatherford, which made three restatements of audited financials totaling approximately \$1 billion, misled investors about the Company's tax accounting. After more than three years of intense litigation, including 22 depositions and complex expert testimony, plaintiffs reached an outstanding recovery of \$120 million on behalf of shareholders.



Will received a B.A. from Union College (2009) and a J.D. from Washington University in St. Louis (2013). Will is admitted to practice in New York (2015) and in Massachusetts (2013).

**FRANKLYN WILLIAMS**  
Senior Projects Attorney

New York

- Email: [fwilliams@bfalaw.com](mailto:fwilliams@bfalaw.com)
- Tel: +1 212 789 1357
- [www.bfalaw.com/professionals/franklyn-williams](http://www.bfalaw.com/professionals/franklyn-williams)

Franklyn Williams brings nearly a decade of legal experience to his role as a Senior Projects Attorney. As a Senior Projects Attorney, Franklyn is an integral part of the team currently litigating *Ontario Teachers' Pension Plan Board, et al v. Teva Pharmaceutical Industries Ltd. et al*, which alleges that Teva fraudulently misled investors about its U.S. generics business, its financial performance, and its participation in a widespread generic drugs antitrust conspiracy.

Prior to joining BFA, Franklyn served as a Team Leader on a variety of complex litigation. He was also contracted to serve as part of the team at Robbins Geller Rudman & Dowd that litigated *Beaver County Emps' Ret. Fund v. Tile Shop Holdings, Inc.*, resulting in a \$9.5 million recovery.

Franklyn received his J.D. in 2006 from Boston University School of Law where he served as the Editor in Chief of the Boston University International Law Journal and participated in the Civil Litigation Clinic. Franklyn earned his BA in 2003 from Cornell University with a minor in Law & Society and majors in both government and philosophy. While attending Cornell, Franklyn externed with Judge Patricia Anne Williams of the Bronx County Supreme Court and summer interned with both NYC HRA Bureau of Fraud Investigation and NYC ACS Legal Division.

Franklyn is admitted to practice in New York (2008) and New Jersey (2007).

**JANELLE MOODY**  
Projects Associate

Oakland

- Email: [jmoody@bfalaw.com](mailto:jmoody@bfalaw.com)
- Tel: +1 415 445 4006
- [www.bfalaw.com/janelle-moody](http://www.bfalaw.com/janelle-moody)

Janelle Moody joined the Firm in 2016 and is currently a Projects Associate in BFA's Oakland office. Janelle brings extensive experience in all phases of litigation to the Firm. She currently plays a significant role in managing discovery in *In re Facebook, Inc. Consumer Privacy User Profile Litigation*. Her role of providing strategic discovery advice was integral in the negotiation of electronic discovery issues in the *In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices, and Products Litigation*.

Janelle earned her J.D. from Northwestern School of Law at Lewis and Clark College (1997) and is admitted to practice in California (2003) and Oregon (1998).

**KATHERINE SULLIVAN**  
*Projects Associate*

Oakland

- Email: [ksullivan@bfalaw.com](mailto:ksullivan@bfalaw.com)
- Tel: +1 415 445 4014
- [www.bfalaw.com/katherine-sullivan](http://www.bfalaw.com/katherine-sullivan)

Katherine Sullivan (“Kasey”) joined the Firm in 2016 and is currently a Projects Associate in BFA’s Oakland office. Kasey brings nearly two decades of experience to BFA. She currently plays a significant role in managing third party discovery in the *In re Domestic Airlines Travel Antitrust Litigation* and *In re Facebook, Inc. Consumer Privacy User Profile Litigation*.

Kasey earned her J.D. from Northwestern University School of Law (1999), and is admitted to practice in California (2000).

**DAVID WAX**  
*Staff Associate*

New York

- Email: [dwax@bfalaw.com](mailto:dwax@bfalaw.com)
- [www.bfalaw.com/professionals/david-wax](http://www.bfalaw.com/professionals/david-wax)

David Wax has significant experience litigating complex matters in New York Federal and State Courts.

David focuses his practice on the discovery phase of complex commercial litigations and has played a meaningful role supporting the litigation teams in the Firm’s securities, antitrust and consumer class action practice groups.

Prior to joining BFA Mr. Wax was an associate at a large New York law firm where he focused his practice on class actions, insurance and contractual disputes, and complex judicial foreclosures.

David earned his J.D. from Fordham University School of Law (2008) and is admitted to practice in New York (2009) and the Southern and Eastern District of New York (2009).

**SYLVIA SUM**  
*Staff Associate*

Oakland

- Email: [ssum@bfalaw.com](mailto:ssum@bfalaw.com)
- Tel: +1 415 445 4003

Sylvia Sum joined the firm in 2016, and is a staff associate at BFA’s Oakland office where she focuses on prosecuting consumer and anti-trust class actions. Sylvia brings over twenty years of experience to BFA. She has played a meaningful role in litigating several matters including *In re Volkswagen “Clean Diesel” Marketing, Sales Practices, and Products Liability Litigation* and *In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices, and Products Liability Litigation*. In each of these litigations Sylvia’s German language skills have been critical in analyzing the evidence underlying plaintiffs’ claims.



Sylvia earned her J.D. from the UCLA School of Law (1997), and is admitted to practice in California (2000) and Oregon (1997).

**GLEN TSURUDOME**  
*Staff Associate*

**Oakland**

- Email: [gtsurudome@bfalaw.com](mailto:gtsurudome@bfalaw.com)
- Tel: +1 415 789 1348

Glen Tsurudome joined BFA's Oakland office in 2019 where he is currently a Staff Associate. Glen brings over a decade of experience to his role as staff associate at BFA's Oakland office where he focuses on prosecuting consumer and antitrust class actions.

Glen received a B.A. (2005) from the University of California, San Diego and a J.D. from the University of San Francisco School of Law (2005). Glen has also completed the Yamasa Institute Academic Intensive Japanese Program (2012). Glen is admitted to practice in California (2005).

**CHRISTOHER CAPUOZZO**  
*Associate Director, Client Data  
and Claims*

**New York**

- Email: [ccapuozzo@bfalaw.com](mailto:ccapuozzo@bfalaw.com)
- Tel: +1 212 789 2307
- [www.bfalaw.com/professionals/christopher-capuozzo](http://www.bfalaw.com/professionals/christopher-capuozzo)

Christopher Capuozzo is a Senior Data Analyst who joined BFA in January 2017 with more than twelve years of experience in the securities class action and claims filing fields. Chris is a member of the Firm's Data Analysis team, contributing to BFA's Global Investment Monitoring Program and analyzing clients' loss exposure to financial fraud across the global marketplace. He also is a member of the Firm's Claims Filing team and is instrumental in the preparation of claim documents on behalf of eligible clients. His financial analysis assists in the identification and evaluation of potential opportunities for the Firm's clients to serve as lead plaintiff, participate in direct actions, join actions outside the United States, and recover from settled matters.

Prior to joining BFA, Chris was a Data Analytics Manager at a securities litigation firm, where he managed a team of analysts providing portfolio monitoring services to the Firm's client base, and also a Research Analyst at the Goal Group of Companies, a global leader in class action recovery services. Chris began his career at a prominent claims administrator. During his time there, he processed electronically filed claims from leading financial institutions, and advised the company's software developers about what fields to include and how to structure their secure claim filing website for institutional investors.

**VICTORIA TSE**  
*Senior Data Analyst*

New York

- Email: [vtse@bfalaw.com](mailto:vtse@bfalaw.com)
- Tel: +1 212 789 3601
- [www.bfalaw.com/professionals/victoria-tse](http://www.bfalaw.com/professionals/victoria-tse)

Victoria Tse joined BFA in 2020 as a Senior Data Analyst. Victoria monitors client portfolios to identify and evaluate investment losses, exposure to financial fraud, and potential opportunities for BFA clients to serve as lead plaintiff, participate in direct actions, join class action litigation in non-U.S. jurisdictions, and recover from class action settlements. In assessing client exposure, she evaluates recovery opportunities for clients based on court-approved loss methodologies for a wide variety of securities fraud allegations. Victoria also helps oversee the acquisition of client investment data from custodians on a monthly basis, as well as maintains clients' accounts by performing annual reviews.

Prior to joining the Firm, Victoria was a senior data analyst at a securities litigation firm.

**Elaine Rivera**  
*Data Analyst*

New York

- Email: [erivera@bfalaw.com](mailto:erivera@bfalaw.com)
- Tel: +1 212 789 3604
- [www.bfalaw.com/professionals/elaine-rivera](http://www.bfalaw.com/professionals/elaine-rivera)

Elaine Rivera monitors and analyzes client exposure to financial fraud and evaluates investment losses and potential opportunities for clients to serve as lead plaintiff. In assessing client exposure, she evaluates recovery opportunities for clients based on court-approved loss methodologies for a wide variety of securities fraud allegations. Elaine also assists with determining client eligibility to participate in class action settlements and submitting the necessary claim documents on behalf of eligible clients.

Prior to joining BFA, Elaine was a Data Analyst at a securities litigation firm.

**Jeffrey Esperance**  
*Data Analyst*

New York

- Email: [jesperance@bfalaw.com](mailto:jesperance@bfalaw.com)
- Tel: +1 212 789 2306
- [www.bfalaw.com/professionals/jeffrey-esperance](http://www.bfalaw.com/professionals/jeffrey-esperance)

Jeffrey Esperance monitors and analyzes client exposure to financial fraud and evaluates investment losses and potential opportunities for clients to serve as lead plaintiff. In assessing client exposure, he evaluates recovery opportunities for clients based on court-approved loss methodologies for a wide variety of securities fraud allegations.

Jeffrey also assists with determining client eligibility to participate in international securities cases and in class action settlements.

Prior to joining BFA, Jeffrey was a Data Analyst at a securities litigation firm.

Jeffrey received a Bachelor of Arts from Baruch College.

**Umang Narayan Suhalka**  
*Data Analyst*

New York

- Email: [usuhalka@bfalaw.com](mailto:usuhalka@bfalaw.com)
- Tel: +1 212 789 3605
- [www.bfalaw.com/professionals/jeffrey-esperance](http://www.bfalaw.com/professionals/jeffrey-esperance)

Umang Narayan Suhalka is a Data Analyst at BFA, where he maintains BFA's proprietary database, monitors and analyzes client exposure to financial fraud, and evaluates investment losses and potential opportunities for clients to serve as lead plaintiff. In assessing client exposure, he evaluates recovery opportunities for clients based on court-approved loss methodologies for a wide variety of securities fraud allegations.

Umang also assists with determining client eligibility to participate in international securities cases and in class action settlements.

Prior to joining BFA, Umang interned at a financial services firm.

Umang received a Bachelor of Engineering in Computer Science from the University of Pune and a Masters of Science in Information Technology from New York University.

**TRACEY SHEAK**  
*Marketing Director*

New York

- Email: [tsheak@bfalaw.com](mailto:tsheak@bfalaw.com)
- Tel: +1 860 810 9177
- [www.bfalaw.com/professionals/tracey-sheak](http://www.bfalaw.com/professionals/tracey-sheak)

Tracey Sheak leads BFA's marketing efforts, with responsibility for client outreach and initiatives with institutional investors throughout the United States.

Tracey is actively involved in the firm's plans and presentations at industry events, conferences, and organizations including the National Conference on Public Employee Retirement Systems (NCPERS), International Foundation of Employee Benefit Plans (IFEBC), as well as many state pension associations, including Texas, Massachusetts, Michigan, Florida, Georgia and Illinois.

A seasoned marketing professional, Tracey has nearly two decades of experience working closely with attorneys and assisting them to expand and enhance the firm's outreach. She also works with firm leadership on a variety of strategic initiatives to further the firm's leading brand and market position.

Outside the firm, Tracey is a successful entrepreneur and founder and president of a high-quality cosmetic and medicinal herbal product line. She has been involved in her communities for many years, volunteering time with organizations including

Massachusetts Special Olympics, Hole in the Wall Gang Camp SCUBA Experience, and St. Vincent De Paul warming shelters along with many local and global environmental and humanitarian initiatives. Tracey resides in Connecticut where she raised her family and still enjoys many outdoor sports and activities along the shore.

For more information, please visit:  
[www.bfalaw.com](http://www.bfalaw.com)

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on October 13, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ DANIEL S. DROSMAN

DANIEL S. DROSMAN

ROBBINS GELLER RUDMAN  
& DOWD LLP

655 West Broadway, Suite 1900

San Diego, CA 92101-8498

Telephone: 619/231-1058

619/231-7423 (fax)

Email: [ddrosman@rgrdlaw.com](mailto:ddrosman@rgrdlaw.com)

**Mailing Information for a Case 4:16-cv-05314-JST In re Twitter Inc. Securities Litigation****Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

- **Jeffrey S. Abraham**  
jabraham@aftlaw.com
- **Peretz Bronstein**  
peretz@bgandg.com
- **Patrick J. Carome**  
patrick.carome@wilmerhale.com, WHDocketing@wilmerhale.com
- **Sam F Cate-Gumpert**  
SamCategumpert@dwt.com, vickyisensee@dwt.com
- **Alexis S. Coll**  
ascoll@goodwinlaw.com, JMckenzie@goodwinlaw.com, jhernandez@goodwinlaw.com
- **Patrick V. Dahlstrom**  
pdahlstrom@pomlaw.com
- **Anne Kathleen Davis**  
adavis@bfalaw.com
- **Brett Hom De Jarnette**  
bdejarnette@cooley.com, efilingnotice@cooley.com, jalvarezlopez@cooley.com, efiling-notice@ecf.pacerpro.com
- **Daniel S. Drosman**  
DanD@rgrdlaw.com, tholindrake@rgrdlaw.com, e\_file\_sd@rgrdlaw.com, tkoelbl@rgrdlaw.com, DanD@ecf.courtdrive.com
- **John C. Dwyer**  
dwyerjc@cooley.com, eFilingNotice@cooley.com, efiling-notice@ecf.pacerpro.com, emadrigal@cooley.com
- **Laura Marie Elliott**  
lelliott@cooley.com, dfoster@cooley.com, efilingnotice@cooley.com, efiling-notice@ecf.pacerpro.com
- **Joseph A. Fonti**  
jfonti@bfalaw.com, ecfnofications@bfalaw.com, ndennany@bfalaw.com
- **Janet A Gochman**  
jgochman@stblaw.com, 3892155420@filings.docketbird.com, cterricone@stblaw.com
- **Kathleen Howard Goodhart**  
kgoodhart@cooley.com, eFilingNotice@cooley.com, efiling-notice@ecf.pacerpro.com, jpalaganas@cooley.com
- **Marc Gorrie**  
mgorrie@pomlaw.com
- **Tor Gronborg**  
torg@rgrdlaw.com, E\_File\_SD@rgrdlaw.com
- **Max Nikolaus Gruetzmacher**  
mgruetzmacher@motleyrice.com, vdavis@motleyrice.com, kquillin@motleyrice.com
- **Ellen Anne Gusikoff-Stewart**  
elleng@rgrdlaw.com, e\_file\_sd@rgrdlaw.com
- **J. Alexander Hood , II**  
ahood@pomlaw.com
- **James Michael Hughes**  
jhughes@motleyrice.com, erichards@motleyrice.com, kweil@motleyrice.com
- **Joseph Marco Janoski Gray**  
mjanoski@rgrdlaw.com, msonney@rgrdlaw.com, tdevries@rgrdlaw.com
- **Christopher J. Keller**  
ckeller@labaton.com, 5497918420@filings.docketbird.com, lpina@labaton.com, drogers@labaton.com, electroniccasefiling@labaton.com
- **Christopher Ryan Kinnon**  
ckinnon@rgrdlaw.com, CKinnon@ecf.courtdrive.com
- **James Glenn Kreissman**  
jkreissman@stblaw.com, kourtney.kinsel@stblaw.com, justin.calderon@stblaw.com, eric.mccaffree@stblaw.com, abigail.dugan@stblaw.com, 1058725420@filings.docke
- **Gregg S. Levin**  
glevin@motleyrice.com, sturman@sturman.ch, lmclaughlin@motleyrice.com, erichards@motleyrice.com, kweil@motleyrice.com
- **Jeremy A. Lieberman**  
jalieberman@pomlaw.com

- **Jeremy A. Lieberman**  
jalieberman@pomlaw.com,disaacson@pomlaw.com,fgravenson@pomlaw.com,ipareja@pomlaw.com
- **Nathan R. Lindell**  
nlindell@rgrdlaw.com,Nlindell@ecf.courtdrive.com
- **Francis P. McConville**  
fmconville@labaton.com,HChang@labaton.com,lpina@labaton.com,drogers@labaton.com,9849246420@filings.docketbird.com,electroniccasefiling@labaton.com
- **Dean Michael McGee**  
dean.mcgee@stblaw.com
- **Sonal N. Mehta**  
sonal.mehta@wilmerhale.com,Felicia.Roy@wilmerhale.com,whdocketing@wilmerhale.com,Leizel.Galon@wilmerhale.com,Claire.Bergeron@wilmerhale.com
- **Christopher Francis Moriarty**  
cmoriarty@motleyrice.com,lmclaughlin@motleyrice.com,kweil@motleyrice.com
- **Danielle Suzanne Myers**  
dmyers@rgrdlaw.com,shawnw@rgrdlaw.com,dmyers@ecf.courtdrive.com,e\_file\_sd@rgrdlaw.com
- **William H. Narwold**  
bnarwold@motleyrice.com,mjasinski@motleyrice.com,ajanelle@motleyrice.com
- **Stephen Cassidy Neal**  
sneal@cooley.com,wilsonla@cooley.com
- **Lance V. Oliver**  
loliver@motleyrice.com
- **Meghan Shea Blaszk Oliver**  
moliver@motleyrice.com
- **Lucas F. Olts**  
Lolts@rgrdlaw.com,morgank@ecf.courtdrive.com,e\_file\_sd@rgrdlaw.com,LOlts@ecf.courtdrive.com
- **Jennifer Pafiti**  
jpafiti@pomlaw.com,jalieberman@pomlaw.com,ahood@pomlaw.com,disaacson@pomlaw.com,ashmatkova@pomlaw.com,abarbosa@pomlaw.com,fgravenson@poml
- **Michael J Pendell**  
mpendell@motleyrice.com
- **Charles J. Piven**  
piven@browerpiven.com
- **Aarti G. Reddy**  
areddy@cooley.com,dfoster@cooley.com,galancr@cooley.com,efiling-notice@ecf.pacerpro.com
- **Rosemary M. Rivas**  
rmr@classlawgroup.com,2746730420@filings.docketbird.com
- **Quentin Alexandre Roberts**  
qroberts@sullivanblackburn.com,aiemee.low@diamondmccarthy.com
- **John Alexander Robinson**  
jrobinson@stblaw.com,1629454420@filings.docketbird.com
- **Laurence Matthew Rosen**  
lrosen@rosenlegal.com,larry.rosen@earthlink.net,lrosen@ecf.courtdrive.com
- **Kelli L. Sager**  
kellisager@dwt.com,vickyisensee@dwt.com
- **Scott H. Saham**  
scotts@rgrdlaw.com,ScottS@ecf.courtdrive.com
- **Juan Carlos Sanchez**  
jsanchez@rgrdlaw.com,e\_file\_SD@rgrdlaw.com
- **Shane Palmesano Sanders**  
ssanders@robbinsllp.com,notice@robbinsllp.com
- **Heather G. Schlesier**  
hgeiger@rgrdlaw.com,cbarrett@rgrdlaw.com,HSchlesier@ecf.courtdrive.com
- **Eric Matthew Stahl**  
ericstahl@dwt.com,christinekruger@dwt.com,seadocket@dwt.com
- **Simona Gurevich Strauss**  
sstrauss@stblaw.com,janie.franklin@stblaw.com,sblake@stblaw.com
- **Phong L. Tran**  
phongt@johnsonfistel.com

- **Jessica Valenzuela**  
JValenzuela@gibsondunn.com,KBarry@gibsondunn.com
- **David Conrad Walton**  
davew@rgrdlaw.com
- **Meredith B. Weatherby**  
mbmiller@motleyrice.com
- **Lesley Elizabeth Weaver**  
lweaver@bfalaw.com,emily-aldrige-5965@ecf.pacerpro.com,lesley-weaver-4669@ecf.pacerpro.com
- **Shawn A. Williams**  
shawnw@rgrdlaw.com,ShawnW@ecf.courtdrive.com,e\_file\_sd@rgrdlaw.com
- **Jonathan K. Youngwood**  
jyoungwood@stblaw.com,7448332420@filings.docketbird.com,ManagingClerk@stblaw.com

### Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)